

United States v. Andrade

**Defendant's Sentencing
Memorandum**

ATTACHMENT-3

Deposition of:

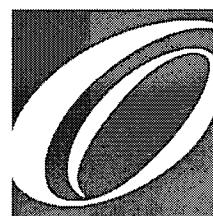
Corey Jodoin

Case:

NAC Foundation, LLC v. Corey Jodoin, et al.
A-18-770594-C

Date:

04/16/2020



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Andrade App 000459

Corey Jodoin

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1	DISTRICT COURT	1	
2	CLARK COUNTY, NEVADA	2	
3	*****		
4			
5	NAC FOUNDATION, LLC, a Nevada limited liability company.	5	
6			
7	Plaintiff, Case No. A-18-770594-C	6	
8	vs. Dept. No. XIV	INDEX	
9	COREY JODOIN, individually;	7	
10	BRANDI JODOIN, individually;	8	
11	DOES 1 through 10; and ROE CORPORATIONS 1 through 10,	COREY JODOIN	
12			
13	Defendants.	9	
14			
15			
16	REMOTE VIDEOCONFERENCE DEPOSITION OF COREY JODOIN	Examination by Mr. Olsen	
17	Taken on April 16, 2020	5	
18	At 1:18 p.m.	*****	
19			
20			
21			
22			
23	Reported by: Kimberly A. Farkas, RPR, CCR #741	EXHIBITS	
24	Job No. 40188	13	
25			
	No.	Description	Page
	15	Exhibit 1	Bates Nos. 0001 - 0098
	16	Exhibit 2	4
	17	Exhibit 3	Bates Nos. 0099 - 0111
	18	Exhibit 4	4
	19	Exhibit 5	Bates Nos. 0112 - 0329
	20		4
	21		Exhibit 6
	22		Bates Nos. 0330 - 0503
	23		4
	24		Exhibit 7
	25		Bates Nos. 0504 - 0526
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1	Remote Videoconference Deposition of COREY	LAS VEGAS, NEVADA	
2	JODOIN, taken on Thursday, April 16, 2020, at 1:18	Thursday, April 16, 2020	
3	p.m., before Kimberly A. Farkas, Certified Court	1:18 p.m.	
4	Reporter in and for the State of Nevada.	DEPOSITION OF COREY JODOIN	
5			
6	APPEARANCES	*****	
7			
8	For the Plaintiffs:	(Exhibit Nos. 1 through 5 were marked prior	
9			
10	ERIC R. OLSEN, ESQ.	to commencement of the deposition.)	
11	Garman Turner Gordon, LLP	THE STENOGRAPHER: Good afternoon. My name	
12	7251 Amigo Street, Suite 210	is Kimberly Farkas. I am a Nevada certified court	
	Las Vegas, Nevada 89119	reporter here on behalf of Oasis Reporting Services.	
	(725) 777-3000	My CCR number is 741.	
13			
14			
15	For the Defendants:	Today's date is April 16, 2020. The time is	
16			
17	ADAM R. KNECHT, ESQ.	approximately 1:18 p.m.	
18	Alverson Taylor & Sanders	This is the deposition of Corey Jodoin in the	
19	6605 Grand Montecito Parkway, Suite 200	matter of NAC Foundation versus Jodoin, venued in the	
	Las Vegas, Nevada 89149	District Court of the State of Nevada for the County of	
	(702) 384-7000	Clark, Case No. A-18-770594-C.	
20			
21			
22			
23			
24			
25			

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<p>1 attorney, Mr. Olsen.</p> <p>2 MR. OLSEN: Yes. This is Eric Olsen of</p> <p>3 Garman Turner Gordon. I represent the plaintiff, NAC</p> <p>4 Foundation, LLC.</p> <p>5 MR. KNECHT: Adam Knecht with Alverson</p> <p>6 Taylor. I represent Defendant Corey Jodoin.</p> <p>7</p> <p>8 COREY JODOIN,</p> <p>9 having been first duly sworn, was examined and</p> <p>10 testified as follows:</p> <p>11 EXAMINATION</p> <p>12 BY MR. OLSEN:</p> <p>13 Q. Mr. Jodoin, go ahead and restate your name on</p> <p>14 the record, please.</p> <p>15 A. Name is Corey M. Jodoin, Spruce Grove,</p> <p>16 Alberta, Canada.</p> <p>17 Q. What's your address?</p> <p>18 A. Number 31 at 54108 Range Road 280, Spruce</p> <p>19 Grove.</p> <p>20 Q. Have you ever had your deposition taken</p> <p>21 before?</p> <p>22 A. No.</p> <p>23 Q. Well, let me go through a few ground rules</p> <p>24 then. I know you listened in on your wife's deposition</p> <p>25 last week, but you probably weren't listening to this</p>	<p>1 to discern your meaning after the fact in a written</p> <p>2 record so I'd ask that you also not use those</p> <p>3 responses.</p> <p>4 Do you understand that?</p> <p>5 A. I understand.</p> <p>6 Q. Everything being taken -- well, it's also the</p> <p>7 case that you may hear objections by your counsel</p> <p>8 interposed today during this proceeding. In almost</p> <p>9 every case you'll be instructed to answer the question</p> <p>10 despite the objection. The objection is just for the</p> <p>11 record. If there's a rare exception, it would be with</p> <p>12 any attorney/client privileged communication, but aside</p> <p>13 from that, you'll be instructed to go ahead and answer</p> <p>14 the question.</p> <p>15 Do you understand that?</p> <p>16 A. I understand.</p> <p>17 Q. As I said, everything is being taken down</p> <p>18 today by the court reporter. You'll have the chance to</p> <p>19 review the written transcript of the deposition today,</p> <p>20 but because I can comment on changes you may make after</p> <p>21 the fact to the deposition transcript, it's important</p> <p>22 that you give your most accurate answers today if</p> <p>23 possible. Understood?</p> <p>24 A. I understand.</p> <p>25 Q. Now, you should have --</p>	
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<p>1 part. This is a deposition pending in the Clark County</p> <p>2 District Court, which you're familiar with. You were</p> <p>3 placed under an oath, the same oath you would be under</p> <p>4 in a court of law, and you are obligated to give</p> <p>5 truthful answers to the best of your ability in</p> <p>6 response to my questions.</p> <p>7 Do you understand that?</p> <p>8 A. I do understand.</p> <p>9 Q. Even though everything that we're doing here</p> <p>10 is on video, it's also being taken down by the court</p> <p>11 reporter, and that is going to be the official</p> <p>12 transcript of this proceeding. So it's important, for</p> <p>13 purposes of that permanent record, that you understand</p> <p>14 my questions when I ask them. If you don't understand</p> <p>15 a question, you can let me know that, and I will, to</p> <p>16 the best of my ability, I will try to rephrase that</p> <p>17 question.</p> <p>18 It's also important that we not speak over</p> <p>19 each other because the court reporter, especially in</p> <p>20 this setting, has a difficult time taking down multiple</p> <p>21 people speaking at the same time. It's also important</p> <p>22 that you, in response to yes or no answers, that you</p> <p>23 say "yes" or "no" as opposed to shaking your head,</p> <p>24 nodding your head, that sort of thing. Also, saying</p> <p>25 "uh-huh" or "huh-uh" is difficult to -- it's difficult</p>	<p>1 MR. OLSEN: Counsel do you have anything to</p> <p>2 add?</p> <p>3 MR. KNECHT: No. No, I don't.</p> <p>4 BY MR. OLSEN:</p> <p>5 Q. You should have received, I think we're up</p> <p>6 to, five exhibit packets for this deposition today.</p> <p>7 And as I go through the deposition, there will be a</p> <p>8 number of those that I'll refer to. You'll find on the</p> <p>9 bottom right corner of each page in those different</p> <p>10 exhibits a series of numbers. Those are referred to as</p> <p>11 Bates stamp number or I'll just refer to it by its page</p> <p>12 number. So that's how I will -- in the stack of</p> <p>13 documents that may constitute an exhibit, I will refer</p> <p>14 you to that and give you some time to locate the</p> <p>15 particular item.</p> <p>16 A. I was not able to print all of them off. Is</p> <p>17 that something you would like me to do?</p> <p>18 Q. Well, we'll do the best -- do the best we</p> <p>19 can. It's possible we'll have to do a work around</p> <p>20 that. I'm not using all of them. And if I have -- we</p> <p>21 don't have the one that I'm focused on, we'll either</p> <p>22 have to -- madam court reporter, I know we've had some</p> <p>23 people publish the documents and hold them up to the</p> <p>24 camera. I'm not sure how that's going to work, but</p> <p>25 what we may do is take a break and send that particular</p>	

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1	page. We'll see how this works. 2 Did you look at any documents in preparation 3 for your deposition today? 4 A. I looked at a few, yes. 5 Q. What did you look at? 6 A. Mostly the timeline, just trying to get my 7 head around all that transpired. It's been five years. 8 So just trying to review. 9 Q. Okay. And the timeline, did you look at a 10 particular document? Did you have a timeline drawn out 11 or did you look at different documents to determine the 12 timeline? 13 A. Mostly different documents just to kind of 14 get an idea of what was going on. It's been five years 15 and I hadn't really looked at a whole lot of these 16 documents for a while. So just need to refresh. 17 Q. It's been an ongoing case since that time or 18 cases; correct? 19 A. Correct. 20 Q. So you still have a pretty good recollection 21 of the facts as they took place back in 2015-2016? 22 A. Fairly good idea. 23 Q. Okay. Do you recall, of the documents you 24 looked at, any of the particular documents you reviewed 25 to establish the timeline?	A. Correct. Q. Has that timeline been produced in this case to your attorney and then to plaintiffs? A. Yes, that's correct. Q. It has been produced? A. Well, it's with my lawyers. So they have all the documents. MR. KNECHT: Objection. Work product. BY MR. OLSEN: Q. Brandi prepared that for the two of you to look at or were you instructed by your lawyer to prepare that? A. I believe that we were instructed by a lawyer. And I would also say that Brandi was very accommodating to help write down notes and memories. She remembers a lot more of the little details than I do. Q. And are you relying today, to some extent at least, on your review of that timeline? A. No. Q. So you reviewed it and it served no purpose? A. The only purpose that it actually had for me was that it help put perspective in timeframes of when things happened. Q. Did that timeline include communications that
1	A. Can you restate the question. I'm not sure I understand. Q. Name any of the documents you were talking about that you looked at to refresh your recollection of the timeline. A. There's -- I don't have a document number. I don't know how to answer that question. Q. Just tell me what -- just describe them for me and for the record. You don't need to give me -- they don't have to be the exhibits. A. I see. I see. Well, when everything kind of transpired, basically, Brandi had written sort of like a timeline of certain events that happened throughout, you know, the few months that we were with NAC. And so I just reviewed that mostly. Q. Okay. And when did she prepare that timeline? A. I believe that would have been in -- it was updated probably March, somewhere March 2016, May, April-May, somewhere in there. Q. When was it last updated? A. It's never been updated. Q. I thought you said it's been updated. So March 2016, there was a timeline prepared by Brandi, and you've reviewed that?	you or your wife had with the Alberta Securities Commission? A. It did not. Q. Did it include communications you or your wife had with the FBI? A. It did not. Q. Did it include any other communications relating to -- well, did it reference any other communications with any other governmental agency? A. I don't think so. Q. So you became affiliated with NAC Foundation -- if we refer to it as NAC, you'll know what I'm talking about; right? A. I do. Q. -- and you became an officer in some fashion of the company. What was your title? A. Well, when Marcus and I had a relationship, I guess before I was ever given a title, that relationship would have been -- it was a cold call, I guess, to buy some coins as an investment. Q. I'm not asking you about that. I don't need the story from the beginning. I'm asking you at the point when you became -- the point where you were doing some work for NAC, you got a title as an officer; correct?

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1	A. Yes, I was an officer.	1	true of any small company, you have to learn who is who
2	Q. And was that chief operating officer; is that	2	and what needs to be done?
3	correct, COO?	3	A. I agree.
4	A. It was originally CEO Marcus offered me, and	4	Q. Do you agree? Okay.
5	I refused it. Marcus is the face of the company, and I	5	You ran -- I guess you have a business now;
6	was a bit surprised that he would offer that.	6	correct?
7	Q. So you took on the COO role?	7	A. I do.
8	A. He talked me into becoming a COO; correct.	8	Q. It's a construction business of some kind?
9	Q. Okay. How would you describe what duties you	9	A. It is.
10	fulfilled when you had that role? What did you do?	10	Q. And what is that business called?
11	A. Are you asking what I did or what I thought	11	A. C & B Excavating.
12	my duties were?	12	Q. And I assume from that it does excavation
13	Q. Start with what you thought your duties were.	13	related to land and construction projects?
14	A. Well, as a COO, I was very unqualified to be,	14	A. That's correct.
15	you know, a chief operating officer for a digital	15	Q. And at the time that you became involved with
16	company. So it was -- because it was a start-up	16	NAC, you were associated with a different excavating
17	company, that it needed some help just to get things	17	company, I think your wife mentioned; is that correct?
18	rolling, I was more than happy to help Marcus out and	18	A. That is correct.
19	work things through, but at the end of the day, being a	19	Q. What was the name of that company?
20	COO, you know, I thought I'd be involved in promoting	20	A. A & A Trenching.
21	the coin, promoting the company and make it grow.	21	Q. Did they do the same thing or is trenching
22	Q. Okay. What are the qualifications for COO of	22	different than excavating?
23	a cryptocurrency -- well, a technology company which is	23	A. Pretty much the same.
24	designed to put out some sort of cryptocurrency at some	24	Q. Okay. And how big a company -- that company
25	point? What are the qualifications?	25	is no longer in existence, I understand?
	Page 14		Page 16
1	A. I'm not an expert in this digital currency.	1	A. That's correct.
2	I don't know what all the qualifications would be.	2	Q. And how big a company was that? How many
3	Q. You said you weren't qualified. So I'm	3	employees?
4	asking you do you know what the qualifications are?	4	A. We had, from off season, about 45 employees
5	A. Well, I would assume that there's	5	all the way up to about 80.
6	qualifications. You would need to be very good at	6	Q. Would you say 80, is that during on season
7	marketing, not just local but on the world stage. You	7	for construction?
8	would need to have a very good understanding of what	8	A. Yes.
9	the digital currency was. And I'm in a very big	9	Q. Okay. And what was your job for that
10	learning curve so --	10	company? Were you the CEO for that company?
11	Q. Sorry. Go ahead.	11	A. COO.
12	A. -- I wasn't able to fulfill all of that.	12	Q. Okay. Did you have multiple projects at any
13	Q. You took on the role, and you did undertake	13	given time? Did that company have multiple projects at
14	certain tasks. Can you tell me what your recollection	14	any given time?
15	of those tasks was?	15	A. We did.
16	A. I believe helping Marcus manage and build the	16	Q. Okay. What sort is that? Commercial
17	company was the biggest challenge that I had. Learning	17	construction?
18	the company, learning the currency or the environment	18	A. Some commercial construction, some
19	of the world, was another challenge that I had. Trying	19	residential construction.
20	to work with -- within the parameters of NAC. It's a	20	Q. And commercial jobs in particular may be
21	small company. Had to figure out who's doing what and	21	interacting with other contractors and trades; correct?
22	where.	22	A. Yes, we would.
23	So does that answer your question?	23	Q. And you would be interacting with different
24	Q. Yeah. I mean, that would be true of any --	24	people within your company keeping everything sort of
25	you've worked in small companies before. That would be	25	organized; right, as COO?

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1	A. Yes, as a COO, we do our best to make sure 2 everything is going the right way. 3 Q. How long did you do -- sorry. Go ahead. 4 A. Quality and integrity. 5 Q. Because you always want to act with quality 6 and integrity; correct? 7 A. Well, that was the logo of our A & A 8 Trenching. 9 Q. Really? Did it mean anything? Is it true 10 you always wanted to do quality work and act with 11 integrity? 12 A. I think we all want to do that, don't we? 13 Q. One would hope. 14 And how long did you do that for the 15 trenching company, A & A Trenching? 16 A. As the COO, about 10, 12 years. 17 Q. And you worked for the company before that 18 for how long? 19 A. Another 15 years. 20 Q. Did you have another officer role, another 21 title, for the 15 years? 22 A. No. I was a worker, employee. 23 Q. When you -- before -- when you were 24 affiliated as COO of NAC, was it a member of the 25 American Bankers Association?	A. I did. Q. In fact, you sold coins or tokens representing coins to various buyers; correct? A. I did. Q. And did you -- so you don't know whether you mentioned the ABA to anyone, either a buyer or just someone you were interacting with as the COO? A. I don't recall. Honestly, I know that in the presentations there was mentions of the ABA, that we were affiliated, but that's as far as that went. Q. And when you say "presentations," you participated in making some presentations; correct, for NAC? A. I did participate. Q. When you started with NAC and Aten Coin, you became affiliated, was it the Aten Black Gold Coin, is that what was -- the currency that was -- A. Yes. Q. Okay. And at some point they dropped the "Black Gold" part; right? A. They did. Q. What was your understanding of why that occurred? A. Well, I think -- I do not recall. The name Aten Coin came from Terence, Marcus' partner, other
1	A. I believe we were. Q. Okay. Did you participate in any way with the American Bankers Association yourself? A. I did not. Marcus and -- I think Marcus did most of that. Q. Okay. But you knew -- you knew it was affiliated with the ABA. Did Brandi have some interaction with the ABA? A. She had some interaction with the ABA. Q. Do you know the nature of that interaction? A. Very little. She was mostly just trying to read up and understand what was going on. She was trying to understand when there were conferences or bigger things to start getting involved in, a lot of legwork. Q. And did you get involved in any or attend -- get involved in any ABA, American Bankers Association, conferences or interact with that organization? A. I did not. Q. You told -- you told people, other people outside the company, that NAC was affiliated with the American Bankers Association; correct? A. Probably not. Q. You did promote the company; right?	A. That is correct. Q. On behalf of NAC? A. That is correct. Q. You mentioned Terence. Is that Terence Poon? A. Yes, sir. Q. We'll come back to Terence. I'm going to refer you -- probably the easiest place to go for this, we'll see, is Exhibit 4. Do you have Exhibit 4 printed out? A. Exhibit? Q. The exhibits should be numbered 1 through 5 and then there would be those page numbers that I referred to earlier at the bottom right. A. Okay. So is there a page number then? Q. I'm looking at page 330, 0330. A. Okay. I have that. Q. Okay. And this is -- can you tell me what this document is?

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1	A. This is the purchase agreement.	1 coins to, and you presented the purchase agreements
2	Q. Okay. And I will tell you that in Exhibit 4,	2 that look like this one that is to -- this one is
3	Exhibit 4 contains purchase agreements to the following	3 actually to your dad, executed by your dad?
4	people. And if you'll listen to this list, it isn't	4 A. That is correct.
5	listed anywhere, but rather than have you dig through	5 Q. Okay. And you got some credit with NAC for
6	it, I'm going to give you some names.	6 making these sales; correct, or getting these executed
7	Albert Jodoin, is that your father?	7 purchase agreements?
8	A. That is.	8 A. I don't know. The idea was to have some sort
9	Q. Albert Jodoin, Andrea LeFevres, Chantal	9 of credit, but that never came through.
10	Ortmeier, John Bokenfohr, Larry Wells -- is it	10 Q. Was it supposed to be credited against
11	Purchase? Does that ring a bell? Larry Wells?	11 amounts you owed to NAC?
12	A. I'm sorry, the question again, please?	12 A. No.
13	Q. I'm asking you do you know some people named	13 Q. That's not your understanding of the
14	Purchase?	14 agreement?
15	A. No. It's Larry Wells.	15 A. That is correct.
16	Q. It's Larry Wells. It's short. Larry Wells,	16 Q. Take a look at -- well, take a look at page
17	Laura Rodgers, Michael Barter, Mitchell Bokenfohr,	17 0336. 0336, there's signatures for Aga and then for
18	Murray King, Paul McGonigal, Rebecka Hiatt,	18 NAC Foundation. And then there's a section called KYC
19	Scott Rodgers, and Tim Gallant.	19 Compliance Information. What is that referring to?
20	Do you recognize those names?	20 A. I believe KYC means "know your customer."
21	A. I do.	21 Q. Okay. And what did that mean, just that
22	Q. Is there anyone else that you remember	22 you're going to supply this information that's
23	selling the Aten Coin or Aten Coin token to?	23 contained here to NAC?
24	A. Is there anyone that I remember selling it	24 A. Well, I believe it's just to prove that he's
25	to?	25 a person and not just a random, fictitious person. So
	Page 22	Page 24
1	Q. Yeah. All of these are people that are	1 he's a real person and --
2	listed -- that are on purchase agreements that are	2 Q. Okay. Take a look at the next page. It's a
3	contained in Exhibit 4. And all of those purchase	3 document called Validation and Quality Assurance Form.
4	agreements are people that you sold the coins to.	4 A. I have it.
5	Those names all ring a bell?	5 Q. Do you see that?
6	A. They do.	6 A. I see it.
7	Q. And are there any others to whom you sold --	7 Q. Okay. And this has a number of questions,
8	A. I don't remember that there's anyone else	8 eight questions. And what does it say at the top? The
9	that I sold coins to.	9 first line that talks about this form, can you read
10	Q. Did you attempt to sell coins to other	10 that paragraph into the record.
11	people?	11 A. "This form is to be asked to the client by
12	A. There were still many or people interested.	12 the office staff when calling the client and scheduling
13	Q. Okay. And were those people just in your	13 for his or her wallet installation. A copy of this
14	area, in Alberta, or were some of those people from	14 completed form must be in the file of every client."
15	other places?	15 Q. Okay. Did you ensure that each of the
16	A. I would only know the ones in Alberta. I	16 contracts that is in the packet, each of the purchase
17	don't know. I don't know anyone else.	17 agreements that you got people to sign, had a
18	Q. Okay. Let's take a look at page starting at	18 Validation and Quality Assurance Form associated with
19	330. And you said this is the purchase agreement.	19 it?
20	Take a look through it. Take a look at this document	20 A. We did. I did.
21	through page 342. Go ahead and take a look through it.	21 Q. You did? And what was your understanding of
22	Have you had a chance to take a look?	22 the reason for this form, which is different than the
23	A. Yes, sir.	23 KYC information?
24	Q. So the people that I named are people that	24 A. This was, I believe, the quality assurance
25	you presented purchase agreements to. You sold the	25 that was given to the office staff directed by Marcus,

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1	of course, for quality assurance to show that whoever	1	A. I don't recall.
2	sold the coins, that the company validated that they	2	Q. Okay. Could you read the first line just
3	were -- whoever sold the coins did it properly, yes.	3	under the title of this document on 0339.
4	Q. Okay. And in the case of all these	4	A. First line under the title?
5	particular purchase agreements, you had sold the coins	5	Q. Yeah. It starts with "This form."
6	and so you would hope there would be a Validation	6	A. "This form is to be asked to the client
7	Quality Assurance Form for each of those contracts;	7	representative based on his dealing with the client.
8	correct?	8	This is to be asked by an NAC authorized
9	A. Well, I would.	9	representative."
10	Q. Did you check to make sure there were for	10	Q. Okay. So you've indicated that you didn't
11	each of these?	11	necessarily check to see if the Validation and Quality
12	A. I did not check to do each of them or, I'm	12	Assurance Forms had been completed. In the case of the
13	sorry, for all of them. Because there was a concern	13	CALE forms on purchase agreements you obtained, you
14	towards the end of -- this was Marcus' job. This is	14	signed those; correct?
15	Marcus' office building; right.	15	A. Could you repeat the question, please.
16	Q. That wasn't my question. My question wasn't	16	Q. You signed all the CALE forms on the purchase
17	whose job it was. You're the person who sold. I'm	17	agreements that you obtained?
18	just asking you as the seller whether you checked to	18	A. I did.
19	see whether each of those agreements ended up having a	19	Q. So I want to ask you --
20	Validation Quality Assurance Form?	20	A. On the ones -- the office would send the CALE
21	A. As the seller, I don't think that was my job.	21	form back to me, and that's when I would go through it
22	I do -- I do believe that the office was to confirm	22	and sign it.
23	this was to happen. And that information went to	23	Q. And the calls to and from the office were
24	Marcus.	24	recorded; correct, at that time anyway for quality
25	Q. I'm asking you a different question. And the	25	assurance?
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1	answer seems to be, no, you didn't check to see whether	1	A. I believe so.
2	each of these purchase agreements that you had entered	2	Q. Okay. Did you ever access any call tapes?
3	into on behalf of NAC with your friends and relatives	3	A. Never.
4	in Canada contained the Validation Quality Assurance	4	Q. Okay. Did you ever direct anyone to any call
5	Form; correct?	5	tapes?
6	A. I did not check.	6	A. No, I never did. And I've honestly never
7	Q. Now, the next page after that form on page	7	been involved in that. It's a tool I am not used to or
8	0339, that's the beginning of a document called Client	8	accustomed to.
9	AML Evaluation or acronym C-A-L-E.	9	Q. Did you direct the FBI to any call tapes or
10	Are you familiar with the C-A-L-E or CALE	10	the existence of any call tapes?
11	form?	11	A. Absolutely not.
12	A. I've seen this form, yes.	12	Q. On this form -- well, as to this form and
13	Q. Well, based on the next page, page 0340,	13	anybody that you did not enter the purchase agreement,
14	you've done more than see it. You've signed it;	14	you got the purchase agreement from, did you ever
15	correct?	15	sign -- as you signed here on page 0340, did you ever
16	A. That's correct.	16	sign any other CALE forms that you had not obtained the
17	Q. Okay. And is it the case that you -- is it	17	purchase on?
18	the case that you, I think, signed all of the purchase	18	A. I don't recall.
19	agreements that you had obtained, the ones that are in	19	Q. If you had done so, why would you have done
20	the exhibit, yourself? You signed off on the CALE	20	so?
21	form; correct?	21	A. I don't recall. I don't think I would have
22	A. On these ones I did, yes.	22	because I wouldn't have been selling; right?
23	Q. Did you sign off on any others that were not	23	Q. Well, is it -- were you a client
24	people that you had obtained the purchase agreement	24	representative with respect to anyone, as designated
25	from?	25	here, with respect to anyone from whom you did not --

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1	well, a different party got the client -- purchase	1	Q. Do you know who that would be?
2	agreement from? If you can understand that.	2	A. Rick Stevens was one person that comes to
3	A. Can you repeat it.	3	mind. And I had met him -- I had talked to him a few
4	Q. Did you sign as client representative on any	4	times and he was on the fence. So I actually referred
5	purchase agreements other than the ones that you	5	him to Marco Diadamo. So I basically surrendered my
6	obtained from your Canadian clients?	6	client representative so that he could have someone
7	A. I don't think so.	7	else from the NAC group to walk him through the
8	Q. And based upon looking at the last page of	8	purchase of the coins.
9	this, well, page 0340, the page that you signed, read	9	Q. Did Rick Stevens end up buying coins?
10	that sentence in the box below your signature.	10	A. I have no idea.
11	A. The one that says "NAC authorized	11	Q. Anyone else? You mentioned there might have
12	representative area?"	12	been two people.
13	Q. And goes on to say, "Based on."	13	A. Maybe a couple I was talking to. I can't
14	A. "Based on the information provided by the	14	remember right now, and I wouldn't know if they did
15	client representative, do you feel that this needs to	15	fulfill it so...
16	be investigated further? If yes, you must submit this	16	Q. Is Rick Stevens a local up there with you?
17	form to our compliance officer."	17	A. He lives in Alberta.
18	Q. So the information contained in this form	18	Q. Was NAC a member of the U.S. Federal Reserve
19	that was obtained in the case of these contracts from	19	Faster Payment Task Force?
20	you, you filled out the form indicated here? When I	20	A. Yes, we were.
21	say "filled it out," it's just circling a bunch of	21	Q. And that was during the time you were the
22	either Ys or Ns; right?	22	COO; correct?
23	A. Well, I did sign the form.	23	A. That is correct.
24	Q. And you would have supplied the information	24	Q. In fact, you were designated the person to
25	contained in the form on lines -- as to lines 1 through	25	interact with the task force; right?
	Page 30		Page 32
1	14 on this document; correct?	1	A. That is correct.
2	A. That is correct.	2	Q. And when was this interaction? The timeframe
3	Q. Did you -- I don't know how these sales	3	is somewhere between, I guess, the fall of 2015 and
4	worked, these purchase agreements. I know you went and	4	sometime March or so of 2016. That's the timeframe
5	you made presentations and you got -- some people	5	that this would have occurred; right?
6	signed purchase agreements; correct?	6	A. I agree.
7	A. Some people did.	7	Q. Where within that timeframe would you place
8	Q. Did you send to others or give to other	8	your interaction with the task force?
9	people whom you had made the pitch to or presentation	9	A. I would say December to February.
10	to purchase agreements which they just didn't sign and	10	Q. What was that interaction? Did you have
11	return?	11	meetings or conferences or what?
12	A. You mean did I send an obligation to people	12	A. I attended one conference. Many of the
13	who didn't purchase any coins at all?	13	meetings were held over an online video or the notes
14	Q. Not an obligation. Did you give them a	14	were reviewed or sent to those who were interested or
15	purchase agreement and say, Hey, here's the deal, if	15	registered. And the Federal Reserve was looking for a
16	you want to do it, sign this document, anything like	16	way to make faster payments. So they had invited a
17	that?	17	conglomerate of people to get involved to know what the
18	A. Well, I would agree that, yes, I would have,	18	Federal Reserve is looking for, and then present a
19	but there was a few people that it was still just a	19	presentation.
20	phone call to see how they were doing. So I think not	20	Q. So you, on behalf of NAC, participated in
21	all of them got a purchase agreement.	21	some online meetings?
22	Q. Okay. How many, would you say, how many	22	A. Yes, I did.
23	people who didn't sign a purchase agreement received	23	Q. And then you attended a conference; is that
24	one from you in one way or another?	24	right?
25	A. Just a couple maybe.	25	A. That is correct.

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1	Q. When was that conference?	1 conference, some sort of an application?
2	A. That was the conference in Chicago. I believe it was in February.	2 A. Yes. They were looking for applications through either a video or some sort of presentation on 3 how you could help the Federal Reserve become better.
4	Q. Were you the only one there on NAC's behalf?	4 And there were some people or some businesses that 5 could make only parts of it better, and they would 6 still do their presentation. At the conference, they 7 were letting us know what was their challenges, but 8 there was no one presenting at the conference.
5	A. I was.	9
6	Q. So your wife was not there?	10 Q. As far as presentations, though, you put
7	A. She was not.	11 together a presentation to make to the task force?
8	Q. She had -- she told us in the deposition last	12 A. Yes, we paid for a video.
9	time her title. What was her title with the company?	13 Q. Okay. And it was a video? In video form?
10	A. Her title?	14 A. That is correct.
11	Q. Yes. She described her title, and I don't	15 Q. And was it submitted to the task force?
12	recall the term off the top of my head, but do you	16 A. I don't believe so.
13	recall what it was?	17 Q. You actually worked on it yourself, along
14	A. Everyone's assistant?	18 with others, Marcus and others?
15	Q. No. I mean the title that was --	19 A. I worked on it with Marcus and Jarek and with
16	A. The title that Marcus gave her was CAO, chief	20 Brandi, of course Brandi.
17	administrative officer, the title Marcus gave to her.	21 Q. Did you appear in it, in the video?
18	Q. So she was doing administrative things. And	22 A. I did not appear in the video.
19	she was not in Chicago for the task force meeting;	23 Q. Okay. Did anyone actually appear, any faces
20	correct?	24 appear?
21	A. That is correct.	25 A. I asked Brandi to appear in the video. And
22	Q. I understand, I think she said, you guys have	
23	10 kids?	
24	A. We have 12.	
25	Q. 12; okay. Cheaper by the dozen. I imagine	
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1	she's probably home taking care of the kids.	1 the consensus was she has a very photogenic face. And
2	So when you were at the conference in	2 she was asked. She accepted.
3	Chicago, what did you learn at that conference?	3 Q. So she actually appeared in the video, Brandi
4	A. Well, I learned that they were open to many	4 did. And did Brandi also work on the video?
5	concepts, many different ways of doing business. I	5 A. No.
6	think they were really looking for some very, very	6 Q. Okay. Are you sure that Marcus worked on it
7	high-end alternatives. And I think they were trying to	7 or was it -- are you sure about that?
8	build community within -- you know, there were many	8 A. I'm pretty sure Marcus knew about it and was
9	banking professionals there. There were many digital	9 involved in it. He had seen the video and he gave a
10	currencies, many faster payment processors	10 thumbs up for almost everything.
11	representatives there. So they were trying to let the	11 Q. Okay. So he knew about it, undoubtedly. My
12	mass people know their challenges, which were -- the	12 question was did he actually participate in creating
13	Federal Reserve's challenges, which were very difficult	13 the video itself?
14	to get money to everyone in a very timely, orderly	14 A. I believe he did.
15	fashion, and they were asking for ways to make it	15 Q. What did he do?
16	better.	16 A. He was very -- he was helpful for us to
17	Q. You said -- I think you said, "high-end	17 understand how the transactions worked.
18	solutions." What do you mean by that?	18 Q. So I take that to mean you asked Marcus for
19	A. Well, there was a fairly strict -- I don't	19 some information which was included in the video
20	remember all of it, of course, but there were some very	20 presentation?
21	strict rules that they wanted to have because it's	21 A. Well, yes. And -- well --
22	dealing with money. Nothing was quick and simple. It	22 Q. Anything else?
23	was --	23 A. Well, he wrote what he would want us to say
24	Q. I'm not sure if I know what you mean. Did	24 in that regard. Because he's the expert in that, not
25	you have to submit something to be able to attend the	25 me.

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1	<p>Q. What do you mean he wrote it?</p> <p>A. He helped write the script to discuss how the banking works with the digital currency.</p> <p>Q. How the banking works with the digital currency. You had to take information that you gleaned from Marcus and maybe other sources and put it into the video format; correct?</p> <p>A. As a group, we worked on it together.</p> <p>Q. Okay. You told me what Marcus did. Who else was in that group that actually put the nuts and bolts of it together?</p> <p>A. Well, I believe it was Brandi and Jarek. Jarek helped me a little. I can't remember how much Jarek helped. But the script was what we were working on and then we did the video off the script. And Marcus helped us do the script.</p> <p>Q. He helped you do the script?</p> <p>A. Yes.</p> <p>Q. Okay. Who was the primary author? Was that you or was it Jarek?</p> <p>A. Probably Marcus.</p> <p>Q. You said he helped you put together the script. You didn't say he wrote it. He didn't write it; correct?</p> <p>A. Yeah, he did. He wrote it.</p>	<p>Just have to go forward this way.</p> <p>BY MR. OLSEN:</p> <p>Q. So this is a document -- actually, I talked to your wife about these biographies in her deposition, but this is a packet of biographies for the management team for the Aten group; correct?</p> <p>A. Yes, biographies are in that video.</p> <p>Q. Well, 0099, is that part of the video or is that just -- you're looking at a picture, that's what you're telling me?</p> <p>A. Yeah.</p> <p>Q. Okay. You mentioned Jarek. And I was looking for Jarek in this packet. What is Jarek's last name?</p> <p>A. I forget.</p> <p>Q. That's a different person than -- is that a different person than Jaroslaw Sirko?</p> <p>A. No. Jaroslaw Sirko, that's his name.</p> <p>Q. I do see that his -- that his bio is at page 0106. Do you see that?</p> <p>A. No. I have 0113 and on.</p> <p>Q. Okay. I thought you had -- I thought you had 0099, the beginning of the packet; is that correct?</p> <p>A. I don't. Exhibit 4?</p> <p>Q. No. Exhibit 2. Let me ask you, as far as</p>
1	<p>Q. That's different from what you told me before. So he wrote it, you read it, and put your wife on the video. That's not what happened, is it?</p> <p>MR. KNECHT: Objection to form.</p> <p>BY MR. OLSEN:</p> <p>Q. I said, so now you're telling me that he wrote it, your wife read it, and you put it up on video. And then I said, that's not how it worked, is it?</p> <p>A. It's not what I said. What I said was we compiled it together. So what we gave to Marcus, Marcus said, no, this is wrong, rewrite this part, rewrite that part. And he changed our script. He was the major contributor in our script.</p> <p>Q. Okay. Take a look at Exhibit 4. Hopefully, you have it printed out. If you don't have it printed out, you can have it on your computer. Page number 0099 is the beginning of it. It is the Aten Group and National Aten Coin Foundation Management Team packet.</p> <p>MR. KNECHT: Is this Exhibit 4, Counsel?</p> <p>MR. OLSEN: 2, Exhibit 2.</p> <p>THE WITNESS: I don't have it printed, but I have it on my computer.</p> <p>MR. OLSEN: Leave it up on your computer. See if I can read this a little better. Maybe not.</p>	<p>Page 38</p> <p>Jarek, what did he do for you? What was his -- what jobs did he do for you? According to this file, he was manager of business development EU National Aten Coin. That's what it says here. Is that your understanding of his title?</p> <p>A. Yes. He hadn't really worked into his title yet. He was really trying to help us with our video presentations. He had a lot of contacts with the banking industry in Europe. And so we were still trying to develop all of those strategies together.</p> <p>Q. Okay. So he was a guy who, not only did he work on the video, but he had banking contacts. Looked like he had been with Deutsche Bank in the past. Is that your understanding?</p> <p>A. I believe so.</p> <p>Q. According to this, he was with Deutsche Bank. He was also with Raiffeisen Bank. And he had a master's in international business. That's what his bio says. You have no reason to believe that's not true; correct?</p> <p>A. I would agree.</p> <p>Q. You never had any reason to think that Jarek was a dishonest person; right?</p> <p>A. I had no reason to believe that.</p> <p>Q. No reason to believe he misled you or anybody</p>

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1	about anything, whether it's his background or about 2 the product; correct?	1 coin. 2 Q. Is that when you signed the contract with 3 Ms. Bilinska? 4 A. No, I don't believe so. 5 Q. Bilinska, I should say. 6 It was a different time? 7 A. Yeah. 8 Q. Okay. Was the second Poland -- well, were 9 the Poland trips successful? Did you get some things 10 accomplished? 11 A. Well, it seemed to. There's a lot of things 12 that we would get done. There would always be 13 something else we'd have to put back on our plate. It 14 always seemed quite full. 15 Q. How long were you there on those trips? 16 Let's take the first trip. How long were you in 17 Poland? 18 A. Three, four days. 19 Q. And how about for the second trip? 20 A. The same. 21 Q. Okay. So you mentioned Terence Poon before. 22 He was -- what was his role? I'm trying to understand 23 what his role was within NAC. 24 A. I believe -- my understanding of Terence Poon 25 was that he helped to write the code for the Aten Coin.
1	Page 42	1 And he helped to check it to see if it was KYC friendly 2 or approved or know your customer. So I believe he was 3 involved with Marcus to develop the coin to have the 4 patents that it did. That was my understanding. 5 Q. Okay. And there are some patents associated 6 with this technology; correct? 7 A. I'm told there is. 8 Q. Okay. So Terence, he didn't have -- did he 9 have a title? Was he the chief technology officer or 10 something? What was his title? 11 A. Terence didn't really have a title. For the 12 conference, I think we gave him one. 13 Q. So for the conference. Which conference are 14 we talking about? 15 A. The Alberta conference. 16 Q. Okay. Did he attend? 17 A. He did attend. 18 Q. Okay. Did Marcus attend that conference? 19 A. Yes, Marcus attended. 20 Q. You attended, Terence attended, Marcus, and 21 then Brandi. Anyone else? 22 A. Jarek was there, Agnieszka was there, Igor 23 Solodovnik was there. Agnieszka Bilinska was there. 24 Sachin was there. Marco Diadamo was there. 25 Q. Marco Diadamo, your wife and I spoke about

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<p>1 him the last time. He was another client 2 representative; correct?</p> <p>3 A. I believe so. He was the head of sales for 4 NAC.</p> <p>5 Q. You actually referred at least one -- 6 Mr. Stevens referred him to Marco for purposes of 7 closing a deal; right?</p> <p>8 A. I did.</p> <p>9 Q. Let me ask you, as far as Terence, do you 10 have any reason to believe he's a dishonest person?</p> <p>11 A. I have no reason to believe he's a dishonest 12 person.</p> <p>13 Q. Did he ever make any misrepresentations to 14 you?</p> <p>15 A. I don't believe so.</p> <p>16 Q. Now, we talked about Jarek. You mentioned 17 Sachin. Who is Sachin?</p> <p>18 A. Sachin is the wallet installer, technical 19 guy.</p> <p>20 Q. Did he have a title with the company?</p> <p>21 A. Sure. I don't remember.</p> <p>22 Q. Did you ever give instructions to Sachin? Was he somebody that you worked with?</p> <p>23 A. No, I never gave instructions to Sachin. 24 Most instructions were done through Marcus. I had</p>	<p>1 A. Well, you go to the website or the link. And 2 you would push the "download" button to install a 3 wallet. It would go through listing your name and your 4 address and verifying who you were.</p> <p>5 Once that was complete, you had to choose 6 whether it was a Mac or a PC wallet that you needed. 7 And then you let it download.</p> <p>8 Once the wallet was downloaded, then you had 9 to make a call to the office and needed to get ahold of 10 Sachin. Sachin would call you back and try to get your 11 wallet to get active.</p> <p>12 Q. And what was involved -- was there an ID 13 verification process to get it active?</p> <p>14 A. There was an ID verification process. It was 15 very slow and clumsy. And Marcus was trying to develop 16 that even more. He'd brought in other third-party 17 verifiers to kind of make that process quicker.</p> <p>18 Q. Okay. And it was slow, but it worked; right?</p> <p>19 A. Not always. Some computers were too old. Some computers might.</p> <p>21 Q. If it didn't work in a given instance, what 22 would be done to correct that?</p> <p>23 A. I don't know. That was in Sachin's area. And he would go to Marcus for that information.</p> <p>25 Q. So, ultimately, people got coins in their</p>
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<p>1 conversations with Sachin to install my own wallet into 2 my computer. I had conversations with Sachin to 3 understand what some of the hiccups were with his 4 wallets being downloaded on other computers.</p> <p>5 Q. Okay. So installing the wallet. For the 6 record, a wallet is a thing; it's a place where you put 7 your coins; correct?</p> <p>8 A. It is a digital wallet that -- where you 9 store your coins.</p> <p>10 Q. Okay. And so when you described a -- what's 11 the wallet installer then?</p> <p>12 A. I'm not sure I understand the question.</p> <p>13 Q. What exactly is a wallet installer? Is that 14 how you download your wallet? You install it -- you 15 download it and somehow install it into a computer?</p> <p>16 A. Yes, there's a download. You install it onto 17 your computer.</p> <p>18 Q. So tell me about -- you were talking about, 19 with Sachin's assistance, downloading your wallet 20 because you had coins; correct?</p> <p>21 A. I do have coins.</p> <p>22 Q. You still have them?</p> <p>23 A. I still have them.</p> <p>24 Q. What's the process? Walk me through the 25 process of downloading the Aten Coin wallet.</p>	<p>1 wallet, as far as you know?</p> <p>2 A. Yeah. The general thought was if you didn't 3 get the coins, you get your money back so --</p> <p>4 Q. Now, you mentioned third parties. Weren't 5 there always third party companies that did the ID 6 verification?</p> <p>7 A. For Aten Coin?</p> <p>8 Q. Yeah. I mean, this is -- isn't part of this 9 downloading into the wallet, getting coins into the 10 wallet, isn't that part of that ID verification?</p> <p>11 A. Yes. The whole premise of Aten Coin having 12 that was that it would be verified.</p> <p>13 Q. Right. And weren't there always third 14 parties who were participating -- may have been 15 different third parties, but third parties that were -- 16 that were involved in the ID verification?</p> <p>17 A. Well, yes and no.</p> <p>18 Q. Start with the "yes" part.</p> <p>19 A. "Yes" part was Sachin would have been the 20 only one verifying. And that process was very, very 21 slow. And Sachin made comments that it's taking way 22 too long to verify. And so Marcus tried to get third 23 parties involved. So, yes, in the fact that Sachin is 24 a third party, but he's also NAC so --</p> <p>25 Q. Sorry. Go ahead.</p>

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<p>1 A. -- reliability of NAC because Sachin is an 2 employee. Isn't that why you get a third party 3 involved?</p> <p>4 Q. Right. And there were third parties that 5 were -- in fact, you actually -- you actually worked 6 with Marcus to try and recruit or get some other third 7 party providers; correct?</p> <p>8 A. No.</p> <p>9 Q. Well, was there an effort to get third-party 10 providers? I think you already said there was?</p> <p>11 A. Yes, but, again, that wasn't in my scope of 12 work. Marcus let me listen in to one or two calls of 13 third-party verifiers, but --</p> <p>14 Q. Isn't it true that NAC never built -- it 15 didn't have its own verification technology at that 16 point? Didn't it use someone else's verification 17 technology?</p> <p>18 A. I'm not sure.</p> <p>19 Q. I don't know if you ever found -- did you 20 ever find Exhibit 2, which is the one that begins at 21 0099 and goes through 0109?</p> <p>22 A. I did not.</p> <p>23 Q. If you could try to find page 0109, either on 24 your screen or on paper in Exhibit 2.</p> <p>25 A. I think I found the page.</p>	<p>1 time for tech support to download the wallet and then 2 tech support will help you with your credentials, 3 downloading the wallet, and help generate your first 4 wallet address.</p> <p>5 That's option 1?</p> <p>6 A. I see that.</p> <p>7 Q. Okay. Did you use that process when you were 8 describing your interaction with Sachin on downloading 9 a wallet or did you do something else?</p> <p>10 A. You mean -- can you repeat that? My 11 conversation with Sachin?</p> <p>12 Q. No. You said -- well, let me just ask it 13 this way. Did you use, when you downloaded your 14 wallet, option 1 or option 2 on this sheet?</p> <p>15 A. When I downloaded my wallet, I would call the 16 office, which would have been option 1., because option 17 2 wasn't developed yet.</p> <p>18 Q. So you downloaded your wallet prior to the 19 time that this team, management team packet, was 20 completed?</p> <p>21 A. That is correct.</p> <p>22 Q. At some point after that, between that time, 23 the time you downloaded your coins and the time of the 24 conference, option 2 became available as described on 25 this page; correct?</p>
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<p>1 Q. 0109. It says at the top, "How to download 2 an Aten Coin wallet."</p> <p>3 You see that?</p> <p>4 A. Yes, I see it now.</p> <p>5 Q. Okay. So this is part of a package that had 6 the management team bios in it. In fact, the footer on 7 this page says at the bottom "management team" so it's 8 clearly part of the package; right?</p> <p>9 A. Yes.</p> <p>10 Q. Do you remember this being part of the 11 package?</p> <p>12 A. It was part of the package at the conference.</p> <p>13 Q. And you actually handed out the management 14 team packet, including this part of it, at your 15 conference, your sales conference, in Alberta; correct?</p> <p>16 A. Yes, we did.</p> <p>17 Q. Okay. Did you field questions about this 18 "How to download an Aten Coin wallet" or did people not 19 get to that point of asking those questions?</p> <p>20 A. I'm sure we had some questions on how to 21 download a wallet. All the real technical stuff I 22 would direct more to Sachin.</p> <p>23 Q. So in this document it gives two options for 24 downloading a wallet; correct? It says, option 1 you 25 call the Las Vegas office and request to schedule a</p>	<p>1 A. Option 2 became available, yeah, just before 2 the conference.</p> <p>3 Q. Okay. And option 2 goes through some 12 4 steps; right?</p> <p>5 A. I see that.</p> <p>6 Q. Okay. The third step is that the person read 7 terms and conditions and accept those to go on; right?</p> <p>8 A. I see that.</p> <p>9 Q. Okay. And then there's a whole -- the next, 10 step 4, there's a verification email that's actually 11 sent back to the customer who is trying to download the 12 wallet; right?</p> <p>13 A. That's correct.</p> <p>14 Q. And then 4 says, "Click on the account 15 profile verification tab on the left-hand side -- 16 sorry. That's 5. And 6 is complete the verification 17 process.</p> <p>18 So at some point, the person who is on this 19 has to complete a verification process; right?</p> <p>20 A. That is correct.</p> <p>21 Q. Do you know what the process entailed?</p> <p>22 A. The process, I believe, had to be a picture 23 of the person with some sort of ID in the picture with 24 the date.</p> <p>25 Q. Okay. Anything else that you recall?</p>

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1	Anything else you recall?	1 completion of the verification process. Just to make
2	A. Don't really recall much else. I know that	2 sure we're clear on the record, Sachin's role in
3	Sachin was involved to -- he was asked to verify.	3 option 1, which is what you utilized at the time that
4	That's about all I can really say, I guess.	4 you downloaded your wallet, was to guide you through
5	Q. Let me go back for a second to the	5 the process, essentially, of downloading the wallet;
6	authentication, the ID authentication.	6 right?
7	Do you recall a company called Authentic ID?	7 A. I believe so.
8	A. Authentic ID sounds familiar.	8 Q. That's what you recall?
9	Q. Is that a company that you interviewed or	9 A. That's what I recall.
10	considered for that role of outside identification?	10 Q. And when option 2 came into being, this is
11	A. No, I was never part of recruiting anything,	11 the one that's part of the management team packet we
12	any of that verification process.	12 looked at and was presented to the folks in Edmonton,
13	Q. Did you discuss -- well, how about a name	13 did you have -- Sachin's role at that point was if
14	called Junio, J-U-N-I-O?	14 someone did call him, again, was just to help them get
15	A. No clue what that is.	15 through the verification process and one of these other
16	Q. Couple more things about this packet and then	16 processes on this list; right?
17	we'll take a break. It also goes on to the next page	17 A. Sachin's role, as far as I understood, was to
18	to talk about how you purchase Aten coins; right?	18 make sure it was seamless. So if there was an issue,
19	A. On the next page, you said?	19 they would go to Sachin.
20	Q. Correct, page 0110.	20 Q. Now, as far as the verification process, you
21	A. I see that.	21 said you still have a wallet; right?
22	Q. Okay. And this packet, as I think you	22 A. I do.
23	indicated, the packet included bios and how-to	23 Q. So you would anticipate or know that NAC
24	instructions on the wallet and how to purchase coins.	24 still has your biometric data, your ID verification
25	You said, I think, this was presented maybe other	25 data; right?
	Page 54	Page 56
1	places, but certainly at the Calgary meeting,	1 A. Essentially, yes.
2	conference?	2 Q. Okay. That would be your expectation. And
3	A. Can you repeat the question.	3 because you know they gathered it and there's no reason
4	Q. This packet of material, the management team	4 if you still have a wallet, they wouldn't still have
5	packet we've been looking at, it was presented to	5 it; right?
6	potential buyers at the Calgary conference; correct?	6 A. I guess.
7	A. Well, those who attended, we gave them the	7 Q. Right? Yes?
8	packet. So they would have read it. It wasn't in	8 A. I said, I guess.
9	Calgary. It was Edmonton.	9 Q. It's not really a guess. You were a COO and
10	Q. Edmonton. I apologize. I know that's a	10 a coin holder. You know that if you had a wallet and
11	thing.	11 they had your ID verification, they would still have
12	And you actually paid to have this printed up	12 it? That would be part of the deal; right?
13	there in Edmonton; right?	13 MR. KNECHT: Objection to form.
14	A. Yes, I paid for the printing.	14 BY MR. OLSEN:
15	MR. OLSEN: Let's take a break. It's time	15 Q. You can answer the question.
16	for a break.	16 A. You're asking me two different timeframes.
17	MR. KNECHT: Sounds good.	17 So at the time this was formatted, which was 2015-2016,
18	MR. OLSEN: Just five -- let's call it 10	18 I had my wallet a year or so earlier.
19	minutes, actually.	19 Q. Okay. When did you get your wallet?
20	MR. KNECHT: Okay.	20 A. I don't remember. A year, maybe a year and a
21	(Whereupon, a recess was taken.)	21 bit before, 2014.
22	BY MR. OLSEN:	22 Q. Okay. So you were an early adopter. But
23	Q. Let's get back to where we were. I want to	23 your understanding was then, and as the COO you
24	ask you, Mr. Jodoin, a couple more questions about item	24 presented to other people, that there was a
25	6 we looked at, the wallet download process, the	25 verification process and there was data. You

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1	understood there was data that was collected?	1	said you didn't recall participating in the process of
2	A. I did understand that, yes.	2	selecting a new company?
3	Q. Okay. And, again, the expectation would be	3	A. I was involved with Marcus in the
4	for someone who still has a wallet, the company would	4	conversation that he allowed me to participate in, and
5	still have the data?	5	that's pretty much it.
6	A. Absolutely.	6	Q. Okay. I had that wrong. He participated in
7	Q. Okay. And the data -- I mentioned the	7	a conversation with a third party vendor of ID
8	company Junio before. The data was also with the	8	verification, but you didn't run it or contact them; is
9	verification company, which happens to be Junio. You	9	that what you're saying?
10	don't remember the name, you said, but with the	10	A. That's exactly what I'm saying.
11	verification company; correct?	11	Q. Okay. And you don't recall the name of those
12	A. I wouldn't know.	12	companies?
13	Q. You wouldn't know -- are you saying you	13	A. Correct.
14	didn't know whether or not there was a verification	14	Q. Did you know that the contract between NAC
15	company?	15	and Junio for third-party verification was entered into
16	A. I'm saying I wouldn't know if they would hold	16	probably mid-2015?
17	that information or if they would just verify the	17	A. No, I didn't know.
18	information is true what is presented. I wouldn't know	18	Q. Okay. You're not saying that isn't true, you
19	if they hold information.	19	just didn't know that?
20	Q. So you know there was a company. You don't	20	A. That is correct.
21	know that it was Junio. You know they received the	21	Q. Okay. All right. Have you come across the
22	information as part of the verification process, but	22	name Junio in any other context? I know it's a
23	you don't know whether they retained it after that?	23	publicly traded company. I think it's affiliated with
24	A. That's correct.	24	a former Facebook person, in fact, who owns the
25	Q. It is the case, isn't it, that the two	25	company. It's a big company?
	Page 58		Page 60
1	people -- say the two companies that have access to	1	A. I don't -- it doesn't sound familiar to me at
2	information collected by the ID verification company	2	all.
3	would be NAC and then the company that gathered the	3	Q. Okay. Let me take a step back before we go
4	information; right?	4	forward on something. How much money did you raise
5	A. I wouldn't know.	5	through these people that you sold coins to in
6	Q. You wouldn't know. In fact, Mr. Andrade	6	Edmonton? How much money was raised?
7	showed you how to log on and access the information as	7	A. I'm not sure how much money totally was
8	COO of the company, access ID information, verification	8	raised. I only know what sales we got.
9	information, that had been collected on all coin	9	Q. Sales you had was about a hundred thousand?
10	holders; correct?	10	A. I thought they were a hundred thousand, but I
11	A. Well, I know that Marcus and NAC had the	11	think these are a little less. So, yeah, somewhere
12	information.	12	around there.
13	Q. And you logged on or watched him log on to	13	Q. Okay. Now, you had indicated that you
14	show you that; correct?	14	thought you could generate a million or two in sales at
15	A. Yes, he logged on, yes.	15	that conference; correct?
16	Q. Okay. And you're just saying you don't know	16	A. Absolutely not.
17	whether Junio or the company, the independent ID	17	Q. What was your projection?
18	verification company, had that -- had access to that	18	A. I didn't have a projection. Marco Diadamo
19	same information?	19	was the one who said he could easily raise \$2 million
20	A. Correct. I wouldn't know.	20	because of all the past investors that were going to be
21	Q. Okay. And I know you didn't recall the name	21	invited.
22	Junio, but do you recall speaking with anyone at the	22	Q. And so you weren't disappointed or happy, one
23	outside independent ID verification company?	23	way or another, because you didn't have an expectation
24	A. No, I don't recall.	24	about how much would be raised at that conference?
25	Q. And then I asked you before, and I think you	25	A. I was slightly disappointed, but I knew that

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<p style="text-align: right;">Page 61</p> <p>1 it was rather optimistic to have that high of an 2 expectation. I was very happy many people came up to 3 the conference. So I appreciated the support. 4 Q. So you never wrote down a projection or what 5 you estimated you could net from that conference, the 6 company? 7 A. There weren't any projections on that. 8 Q. Let me ask you, you'd mentioned Agnieszka 9 Cenzartowicz, Aga. She's in this same document I 10 believe on page 0104. And my understanding is she's a 11 lawyer and she was -- actually went to law school in 12 Chicago, I believe; is that right? 13 A. That's what I'm told. 14 Q. You knew her; right? 15 A. I met her several times. 16 Q. Okay. You didn't hire her? 17 A. I did not. 18 Q. You worked with her though? 19 A. She was already part of the team. And I 20 believe in one of the times that we were in Poland, we 21 as a group worked towards getting her away from working 22 in her business and being the legal lawyer for NAC. I 23 was involved with that. 24 Q. Okay. Did she sign a contract to do that? 25 A. I believe she did.</p>	<p style="text-align: right;">Page 63</p> <p>1 person when you presented that contract; right? 2 A. At the time, I had no reason to believe she 3 was. 4 Q. Dishonest is the question? 5 A. Dishonest. 6 Q. Whether she was committing any kind of fraud 7 on you; right? 8 A. Right. 9 Q. You said, "at the time." Do you have a 10 different view today? 11 A. I haven't really thought much about it. 12 Q. Do you have any reason to think she's a 13 dishonest person? I'll ask you again now that you've 14 been thinking. 15 A. I don't really have a reason to think she's 16 dishonest, not at the moment. 17 Q. Okay. Are you going to do some more digging? 18 If not at the moment, what are you going to consider or 19 look at to determine whether or not you would change 20 your opinion about her honesty? 21 MR. KNECHT: Object to form. 22 THE WITNESS: You just asked a question that 23 I hadn't thought of. 24 BY MR. OLSEN: 25 Q. You don't think, based on your experience</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. Okay. Did you ask her to sign that contract? 2 A. Marcus asked me. 3 Q. And you presented a contract to her and she 4 signed it? 5 A. Maybe we worked on the contract together and 6 Marcus approved it, and then she was ready to sign it. 7 Q. Okay. And you presented it to her was my 8 question. You presented it to her for signing after it 9 was worked on? 10 A. Yes, I was asked to present it. 11 Q. You don't consider her, Aga, to be a 12 dishonest person; right? 13 A. I have no reason to believe she is or isn't. 14 Q. Okay. You have no reason to believe -- you 15 have no opinion on it? 16 A. I have no opinion on it. 17 Q. You worked with her; right? She did work for 18 a company at which you were the COO; correct? 19 A. That is correct. 20 Q. You presented a contract to her, which you 21 may have worked out with Marcus, but you presented it 22 to her after a time she had been associated with the 23 company already; correct? 24 A. Agreed. 25 Q. You did not believe she was a dishonest</p>	<p style="text-align: right;">Page 64</p> <p>1 with Aga, that she's a dishonest person; correct? 2 A. I don't think she would be -- reason to 3 believe or otherwise. 4 Q. How about -- what's her husband's name again? 5 A. Igor. 6 Q. Igor. What was his -- what was his job, 7 association with the company? 8 A. I believe he was the person involved with 9 Aten Pay, which was a spin-off for Aten Coin, to be 10 able to do the -- perform the transactions. 11 Q. What happened with Aten Pay? Was it 12 developed? 13 A. I'm not sure where it's at or what all 14 happened to it. 15 Q. Do you have any discussion about Aten Pay 16 with anyone else at NAC during your tenure at COO? 17 A. We had some discussions about Aten Pay. 18 Q. And what were those discussions generally? 19 A. Well, the discussions were how to utilize 20 Aten Pay, how to get the coins to be utilized. 21 Q. And Igor was working on that process; 22 correct? 23 A. I assume so. 24 Q. Were you giving him any direction? 25 A. No.</p>

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1	Q. He also has an American law degree, doesn't he?	1	A. At that time, I was told no one had sold currency in Florida. And I had no idea if any other coins were sold in Florida after that.
2	A. I don't know.	2	Q. It wasn't planned to sell coins in Florida based on your participation and discussions at that point with Marcus or with Fahy; correct?
3	Q. That's what the -- that's what the team management brochure that you paid for says. I just was wondering if you'd know.	3	A. No. It was concerning. Marco Diadamo was from Florida.
4	You don't have any reason to think that either he or his wife are dishonest or frauds in any way?	4	Q. Okay. But there was no plan to disregard the prohibition of the state of Florida at that point?
5	A. No reason.	5	A. No, there was no plan to disregard it.
6	MR. KNECHT: Objection to form.	6	Q. Let me ask you -- we didn't really talk about Mr. Mawhinney. I'm not sure how much we're going to talk about him today. Do you know who Mr. Mawhinney is? Do you know who I'm referring to?
7	BY MR. OLSEN:	7	A. James Mawhinney, Tandem Capital. I'm aware of James.
8	Q. I could break it into two questions, but you understood. You don't have any reason to believe either of those two things; right, that they were frauds or dishonest?	8	Q. Did you ever record a conversation with James?
9	A. At the time, no.	9	A. I believe I recorded a conversation when we were in California.
10	Q. And you don't have any -- at this time, as you sit here today, you don't have any reason to say they're dishonest or frauds; is that correct?	10	Q. A live conversation or a telephone conversation?
11	A. I don't know. I don't know where you're going with this. I don't understand.	11	A. A phone conversation.
12	Q. It doesn't matter where I'm going. I'm asking you the question. You said before you didn't have a reason to think they were dishonest. I'm asking	12	Q. What was the subject matter of that
	Page 66		Page 68
1	you today do you have a reason to think they're dishonest?	1	conversation generally?
2	A. I don't think of anything dishonest or not.	2	A. I think James wanted to discuss the refund issue and try to continue recruiting us to be with Tandem Capital in general. I think Marcus and I were trying to get him to commit to refunding the money and then we will discuss other options after that. In general, that's what I remember.
3	Q. You can't think of anything -- okay.	3	Q. And why is it that you wanted him to refund the money that had been paid to him and his company?
4	Do you know who John Fahy is?	4	A. Because we refused his services. NAC refused his services through direction through Marcus and Aga. And I just felt that he wasn't asking the questions right -- answering the questions right.
5	A. I'm aware John Fahy is a lawyer for NAC to help navigate through the digital currency stuff. He was an SEC lawyer before NAC.	5	Q. Okay. And did he refund that money?
6	Q. Right. But his specialty is SEC, Securities & Exchange Commission, work; correct?	6	A. I don't know.
7	A. That was my understanding.	7	Q. Not during your tenure?
8	Q. And you spoke to Mr. Fahy?	8	A. Correct.
9	A. I was on the phone with Mr. Fahy with Marcus Andrade.	9	Q. How much money was it again, roughly?
10	Q. How many times?	10	A. I vaguely remember 50 grand. I don't know.
11	A. Once, maybe twice.	11	Something like that.
12	Q. And what was the nature of those calls? You don't have to tell me the specifics of what was discussed. What was the nature of those calls?	12	Q. When you taped that conversation, how did you tape it? Did you tape it on a tape-recorder? On your phone? How did that record?
13	A. One of the calls was about the Florida state disallowed the sales of digital currency, and I believe Marcus wanted to get ahold of John Fahy in regard to what their next steps were.	13	A. It was a phone recording.
14	Q. After that -- after that did anyone on behalf of NAC sell Aten coins in Florida or attempt to?	14	Q. Okay. Do you still have that phone

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1	recording?	1	executed purchase agreement to you, and then you faxed
2	A. I don't.	2	it to the office?
3	Q. When did you dispose of, lose -- when did	3	A. Yeah, I vaguely remember this, but I don't
4	that disappear?	4	think he signed it. And so -- or there was an issue
5	A. It was on my previous two or three other	5	with payment or something. But, anyway, I sent this to
6	phones, and it just got destroyed. I never even tried	6	Marco Diadamo to close this one.
7	to recover it.	7	Q. Okay. So it looks like there was an
8	Q. When did you get rid of that phone? Do you	8	agreement. You seem to think it was completed but
9	remember what year?	9	ended up it wasn't completed and you tasked Marc with
10	A. I'm not sure.	10	following up?
11	Q. Roughly?	11	A. He was a potential buyer and I didn't think I
12	A. I can't remember. It was five years ago.	12	could close it. So I asked Marco to get involved.
13	Q. Bear with me one second. Would you take a	13	Q. That doesn't make sense. If you said, I
14	look at Exhibit 5, which is a document beginning at	14	faxed the purchase agreement to the office, you would
15	0504. Do you have that printed out or available on	15	have only faxed the purchase agreement to the office if
16	your computer?	16	it was executed; right?
17	A. Just give me a moment.	17	A. No.
18	MR. KNECHT: What number was that, Counsel?	18	Q. I'm trying to use logic. And logic would
19	MR. OLSEN: Well, the exhibit starts -- it's	19	dictate you wouldn't send a blank form to the office
20	Exhibit 5. It starts at 0504.	20	for them to follow-up with Rick; right?
21	MR. KNECHT: Okay.	21	A. I already gave you my answer.
22	MR. OLSEN: I'm going to delve a little	22	Q. You appreciate that, but that makes no sense
23	deeper into that document.	23	based upon what you wrote on the 16th of February,
24	THE WITNESS: I have it.	24	2016.
25		25	A. I can understand why you're questioning it,
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1	BY MR. OLSEN:	1	but I think if you look into the details, you'll see
2	Q. So you do have it; okay. If you go to, a few	2	that it wasn't executed.
3	pages into that, to 0517.	3	Q. It's not attached here, but could you
4	A. Okay. I got it.	4	describe what the attachment entitled "Letter Next
5	Q. Okay. So this is an email from you dated	5	Steps," what that document is?
6	2/16/2016 to surecan.rick@shaw.ca. Do you see that?	6	A. Probably how to call the office and get ahold
7	A. Yes, I see that.	7	of a wallet.
8	Q. And who is surecan.rick?	8	Q. Right. That's a form document, isn't it?
9	A. Rick is Rick Stevens, the one I mentioned	9	A. Yes, it appears to be, yes.
10	earlier.	10	Q. Right. It's not a letter you wrote. It
11	Q. Okay. Now, you said with regard to Rick	11	looks like it's a form that NAC generated, would send
12	Stevens that you had presented him with a purchase	12	to people who had made purchases; correct?
13	agreement. And I think this is the person that you	13	A. Yes, it does.
14	said you sent it to him and then he ended up closing	14	Q. Okay. So it would be surprising, again,
15	the deal with Diadamo, I think is what you said. But	15	wouldn't it, if you sent to him, to Rick, that document
16	I'm reading this email and it says, "Hi, Rick. I have	16	and you did not have a signed purchase agreement,
17	faxed the purchase agreement to the office."	17	wouldn't it?
18	So he got the purchase agreement to you; is	18	A. Again, I can only tell you what I remember.
19	that correct?	19	I don't remember it being executed and I needed help so
20	A. Sorry. I was just reading that. Can you	20	I sent it to the office to get help.
21	repeat the question.	21	Q. The next letter, again, I don't have a copy
22	Q. You say, "Hi, Rick. I have faxed the	22	here, but that letter did include, did it not,
23	purchase agreement to the office. The office will be	23	something along the lines of what we looked at in the
24	contacting you in the next day or so."	24	"How to go download your Aten Coin wallet," paragraph
25	So from this, it appears that he got an	25	6, which indicated there was a verification process;

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1	right? That was included in that next steps letter?	1 right?
2	A. Perhaps.	2 A. Yes, it is. It took a while for Kathy
3	Q. You don't recall?	3 Ireland's production team to get us a copy of the
4	A. I would assume so.	4 video. And so before the Alberta conference and after
5	Q. Bear with me. It's always a bit easier	5 the Alberta conference, we were still working with
6	looking through the paper copy than it is the digital	6 their production team to edit and finalize the final
7	one.	7 copy.
8	In this same exhibit, page 0511, it's an	8 Q. Okay. So this -- this document was, you're
9	email dated February 23rd, 2016 from you to Agnieszka	9 saying, was going to be part of that final product and
10	Bilinska and CC'd to Marcus. Do you see that?	10 Kathy Ireland video?
11	A. I do see it.	11 A. That's what I assume.
12	Q. Okay. So this looks like -- it appears to	12 Q. Do you recall -- do you recall the video --
13	be -- the attachment says "How to purchase Aten coins."	13 and there is a "How to purchase Aten coins" in that
14	It appears to be referring to the page out of the team	14 video; correct?
15	management brochure that you handed out to folks in	15 A. I believe so. I don't remember offhand. I
16	Edmonton. Actually, it says, it's included how to	16 believe that was all part of it, trying to complete the
17	purchase Aten coins. We looked at that before.	17 video with all the information we had.
18	There's instructions on how one purchases -- it appears	18 Q. Who is Mike Barter, B-A-R-T-E-R?
19	to be referring to that same document.	19 A. Mike Barter is a gentleman that lives in this
20	A. Okay.	20 area.
21	Q. And that was -- when did you say the	21 Q. Okay. Was he a coin buyer?
22	conference was in Alberta?	22 A. I believe he was.
23	A. I think it was in January.	23 Q. How did he get a purchase agreement?
24	Q. Okay. So it was before this email was sent?	24 A. I believe I would have sent him one.
25	A. Before this.	25 Q. Okay. Did he complete the transaction? Did
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1	Q. Were sending changes to. Because, actually,	1 he sign it?
2	the email says, "Hi, team. Marcus, please review and	2 A. I believe he did.
3	make comments. Also add details in the red items	3 Q. Did you speak to him about the -- what did
4	below."	4 you say to Mike Barter to get him to sign a purchase
5	Were you working on modifying the "How to	5 agreement?
6	purchase Aten coins" informational at that point?	6 A. I wasn't in direct contact with Michael
7	A. I believe this was just an informational to	7 Barter.
8	give back to Susan Waters, which was at Kathy Ireland.	8 Q. He's a guy in your area and he was a coin
9	Q. Okay. And, for the record, Kathy Ireland,	9 purchaser. You had no direct contact with him?
10	that was a -- you participated in a presentation, video	10 A. He attended the conference. And I don't
11	presentation, hosted by, I guess we'll say, Kathy	11 remember speaking with him at the conference. And he
12	Ireland that we've all heard about; correct?	12 was probably talking to Brandi or the staff to just
13	A. I did participate.	13 purchase coins. I never spoke to him directly.
14	Q. And you were the spokesperson for NAC in that	14 Q. So he might have spoken to Brandi or someone
15	video; right?	15 else, but you didn't speak with him?
16	A. I was one of three people speaking for NAC.	16 A. That's correct.
17	Q. Who else spoke?	17 Q. We'll come back to Mike Barter, but in the
18	A. Marco Diadamo and Marcus Andrade.	18 same exhibit, Exhibit 5, and this is at page 0520,
19	Q. And, I'm sorry, you said -- that took	19 could you look for that for me, it says, "How to
20	place -- that takes place in March or February?	20 purchase Aten coins online."
21	A. What, the Kathy Ireland?	21 A. I see it.
22	Q. Kathy Ireland.	22 Q. Okay. Is this the -- this is several pages.
23	A. Oh, that was back in December.	23 It actually goes from page 0520 all the way through
24	Q. Okay. Well, then this February 23rd email	24 0525; correct? Is that correct?
25	can't be referring to the Kathy Ireland presentation;	25 A. Sorry. I'm still looking. Can you repeat

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1	the question again, please.	1	you tell me what you see on that page?
2	Q. This "How to purchase Aten coins online," I	2	A. Yes. This is a document that was sent after
3	know we looked at the bullet point document before, but	3	the meeting. And it just said "Purchasing Steps 1, 2,
4	this is more of a glossy presentation on how you do	4	3 and 4."
5	that. You were involved in putting this together;	5	Q. When you say "the meeting," you mean the
6	right?	6	meeting in Edmonton?
7	A. I was involved with putting this together,	7	A. The Alberta conference.
8	yeah.	8	Q. And you think this is probably the document,
9	Q. And was this what was made part of the	9	the next steps document, that was sent to Rick Stevens
10	Kathy Ireland video or was it simpler?	10	or what do you think?
11	A. I actually don't recall. I know she got one	11	A. It could be. I don't know. This was more of
12	copy. Whether it's this one or the other one, I don't	12	a general email to all attendants, all conference
13	remember. But it would have been just those two forms.	13	attendants.
14	The other pages were not part of the coin sales for the	14	Q. Okay. And when it talks about purchasing
15	how to download a wallet.	15	steps in the middle of the letter, can you read what
16	Q. Okay. So in this document, the second page,	16	item Purchasing Step 3 says?
17	it says, Step 1, and it has several boxes, 1 through 5,	17	A. Item no. 3) "Proceed with Aten Wallet
18	actually, through 7, 8. How was that disseminated to	18	installation and verification."
19	people, this document? Was it on the website or was it	19	Q. And as we saw from the document a few minutes
20	presented to people and sent to them?	20	ago, verification was sort of a roadblock. If you
21	A. I know that it was on the website for a	21	couldn't get verification, you couldn't move on to the
22	while. I don't know if it had changed. And I can't	22	next steps; correct?
23	remember at this time whether we distributed this one	23	A. Supposed to be that way.
24	or not.	24	Q. You don't have any knowledge that it wasn't
25	Q. It might have been?	25	that way, do you?
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1	A. It might have, yeah.	1	A. I never downloaded a wallet after that so I
2	Q. If you look on this page, page 0521, step 4,	2	have no knowledge of it being any different.
3	step 4 is the -- why don't you read step 4. If you can	3	Q. You have no knowledge of it being any
4	read step 4 on this page.	4	different than your experience is what you're saying;
5	A. It says, "Select the identity verification	5	correct?
6	section. Verify your identity by following the	6	A. Can you repeat that.
7	procedures stated in that section. Be sure to have	7	MR. OLSEN: Yeah. Looks like you froze.
8	your passport or government issued ID ready and make	8	Maybe read that one back.
9	sure that you have a webcam installed on your	9	(Record read as requested.)
10	computer."	10	THE WITNESS: No, that's incorrect.
11	Q. And it says -- it goes on to say, "(You will	11	BY MR. OLSEN:
12	not be able to go to any other section until the	12	Q. What's different about your experience from
13	identity verification section is completed.)"	13	this process, which says you have to go through ID
14	Right?	14	verification?
15	A. Yes, it says that.	15	A. The difference was, by February, enough
16	Q. Okay. So it was made clear, and you haven't	16	development on the wallet had occurred that timing for
17	really said anything different, I guess, but that in	17	procedures and notes was supposed to be far easier and
18	order to get your wallet, you had to go through this	18	quicker.
19	section in which identity was verified; right?	19	Q. Okay. You're not saying there wasn't a
20	A. I agree with you.	20	verification process. You're saying it was slower and
21	Q. And, in fact, if you didn't have a camera to	21	more difficult until the changes were implemented in
22	take a picture of yourself on your computer, you	22	February?
23	couldn't go any further?	23	A. Yes, other than the February. So the changes
24	A. That's correct.	24	could have been implemented before that. I would
25	Q. And on page 0524 of this same document, can	25	assume that come January we were starting to implement

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1	them, but, anyway, yes.	1 Q. Describe what it is -- why you feel that way
2	Q. Okay. At some point, comparing your	2 about your purchase agreements looking back.
3	experience to the subsequent experience, there was a	3 A. I think the biggest thing that I would have
4	change in the speed and ease of verification?	4 said or been more clear on was the coin was a great
5	A. (Inaudible response.)	5 idea. The coin is a great foundation. I think right
6	MR. OLSEN: Could the court reporter hear	6 now the fact that it wasn't going live was paramount to
7	that response?	7 any sale that should have happened. And instead of
8	THE STENOGRAFHER: No.	8 agreements, it should have been just like any coin on
9	MR. OLSEN: We couldn't hear you. You	9 the server, live on an exchange.
10	started to respond to my last question. I'm going to	10 Q. Well, did it go live at some point?
11	have the court reporter read the last question back and	11 A. I believe it did go live after I was gone.
12	then let you try it again.	12 Q. You have the coins in your wallet so you're
13	(Record read as requested.)	13 aware it went live at some point?
14	BY MR. OLSEN:	14 A. No. You can get coins before it is exchanged
15	Q. Is that correct?	15 live on an exchange.
16	A. That was my understanding. I never actually	16 Q. Right. Do the coins in your wallet, once
17	downloaded a wallet to confirm or deny that.	17 they go live, can you tell whether they've gone live
18	Q. Oh, and one more thing about this letter we	18 from your wallet?
19	were looking at, page 0524, the next steps letter,	19 A. I don't know.
20	whatever you want to call it. Whose signature appears	20 Q. You haven't looked?
21	at the bottom?	21 A. I haven't looked.
22	A. It would have been my signature.	22 Q. Wasn't the coin at the time you were with the
23	Q. Okay. As chief operations officer?	23 company actually trading, I think, on the CEX Exchange,
24	A. Yes, that's correct.	24 CEX, I think?
25	Q. I'm trying to find another -- let me ask you	25 A. No, it was not.
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1	this while I'm looking for another letter. This is	1 Q. It was not trading on any exchange?
2	still on the idea of the ID verification question. NAC	2 A. That's correct.
3	would only have, well, and its third-party identifier,	3 Q. You're certain of that?
4	authentication people, would only have your biometric	4 A. It was supposed to be on the CEX Exchange.
5	information if you supplied it for the ID	5 I wasn't involved in that in any way. And I think it
6	identification or verification process for the coin;	6 was a mistake.
7	correct?	7 Q. You think what was a mistake?
8	A. Excuse me? I apologize. You went digital	8 A. Chose the wrong exchange, in my view.
9	again.	9 Q. How? Well, okay.
10	Q. NAC and their third-party verification	10 Were you part of the choice of exchanges?
11	company would only have your biometric information if	11 A. Nope.
12	you had supplied it as part of the ID verification	12 Q. What would have been the right exchange?
13	process for the coin; correct?	13 A. Probably one that was renowned and very
14	A. That's my understanding.	14 popular, one that most currency exchanges are trading
15	Q. Next time we have a break, we'll have one	15 on.
16	more break probably, I need to come back and find	16 Q. Give me two examples.
17	another document. Let me ask you this about the sales	17 A. Hang on a second here. Oh, boy. Well,
18	that you made when you were with NAC. Did you feel	18 BitPath (phonetic) is on one, and they're very popular.
19	that you had defrauded anybody?	19 Coinbase is another one. Kraken is probably another
20	A. I did not.	20 one you can get on, involved. Those are three very
21	Q. Did you feel that you had been dishonest with	21 credible ones.
22	anyone?	22 Q. There are many, many exchanges for
23	A. I did not.	23 cryptocurrency currently; correct?
24	Q. Do you feel that way today?	24 A. Yes, very many.
25	A. I feel a little bit.	25 Q. And not all of those exchanges will accept a

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<p>1 new currency at just any given time; right?</p> <p>2 A. I would agree with that.</p> <p>3 Q. You paid a visit to the Las Vegas office of</p> <p>4 NAC sometime in early 2016; correct?</p> <p>5 A. That's correct.</p> <p>6 Q. When was that?</p> <p>7 A. I think it was before the Alberta conference.</p> <p>8 Q. Okay. And did you have some issues or</p> <p>9 concerns after visiting the office?</p> <p>10 A. Yes, we did.</p> <p>11 Q. And what were those issues or concerns at the</p> <p>12 time?</p> <p>13 A. One of the big concerns were that the files</p> <p>14 for personal and private information were just open on</p> <p>15 a desk, not secured in a cabinet. And I think the</p> <p>16 other concern that I had was that their whole office</p> <p>17 group had access to the NAC files.</p> <p>18 Q. Okay. Let's take the first one. So you're</p> <p>19 saying you saw a file open with customer information?</p> <p>20 A. That is correct.</p> <p>21 Q. Okay. And when you say -- you're saying you</p> <p>22 thought that file should have been in a cabinet?</p> <p>23 A. What I'm saying was there were several files</p> <p>24 that the office was trying to complete the information</p> <p>25 for the CALE and the purchase agreement information.</p>	<p>1 office be far more professional, have a closed, secured</p> <p>2 server so that the other office members didn't have</p> <p>3 access to it. And that we need to deal with these --</p> <p>4 these are customers that have been customers for months</p> <p>5 and months and they were still unresolved.</p> <p>6 Q. Okay. So that would be things -- you had</p> <p>7 some policies and procedures you were looking at</p> <p>8 suggesting be changed; is that fair to say?</p> <p>9 A. We had made an observation and a request to</p> <p>10 Marcus that we need to deal with this.</p> <p>11 Q. Was there a third-party company that was</p> <p>12 responsible for doing the files in compliance?</p> <p>13 A. To my knowledge, I am unaware of another</p> <p>14 company. The office was tasked with the responsibility</p> <p>15 to complete those files.</p> <p>16 Q. Who was working in the office?</p> <p>17 A. I think Patti.</p> <p>18 Q. What's Patti's last name?</p> <p>19 A. It eludes me at this time. Patti and Barb.</p> <p>20 Q. Do you remember we looked at the quality and</p> <p>21 assurance form as part of the purchase agreement, and</p> <p>22 the same people were doing that quality and assurance</p> <p>23 form that were looking at these files you were talking</p> <p>24 about; right? They were the people at the office</p> <p>25 looking at these?</p>	Page 88

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1	A. I don't know how you wouldn't think they	1 A. I don't recall.
2	were. They did work for NAC.	2 Q. Who is Andrea Lefebvre?
3	Q. You own a business in construction. You know	3 A. Andrea Lefebvre is a person who lives in the
4	that not everybody that works on a project is an	4 area. She's a friend of ours.
5	employee. They could be working for a subcontractor --	5 Q. Did she file a complaint with any government
6	I mean, they bring in people.	6 agency against NAC or against Mr. Andrade?
7	Did you even bother to ask who Barbara and	7 A. I have no idea.
8	Patti worked for?	8 Q. She never spoke to you about that?
9	A. Fair enough. I understand your point. They	9 A. No, she has not spoke to me about anything.
10	worked for an office staff that -- or company that	10 Q. About something, but not about NAC?
11	Marcus hired. I don't know the name of the company.	11 A. I meant about anything about a government
12	Q. Do you know somebody named Clifton, Dida	12 agency or complaints.
13	Clifton, or Dida Clifton?	13 Q. Or being called, contacted by, any government
14	A. Sounds familiar. Not sure.	14 agency?
15	Q. Do you know a company called Office Squad?	15 A. That's correct, she never told me anything
16	A. Yeah.	16 about that.
17	Q. Pardon me?	17 Q. Are you aware of any of the people with whom
18	A. Is Office Squad the company that Dida works	18 you and Brandi entered into purchase agreements, in
19	for that Marcus hired?	19 other words, you obtained the purchase agreements,
20	Q. I just asked if you know the name.	20 anyone who communicated with the
21	A. Sounds familiar.	21 Alberta Securities Commission, any of those people?
22	Q. After the -- so after the visit to the office	22 A. I have no idea if anyone else communicated.
23	and I guess you made some suggestions about how things	23 There's only one person, Tyler Hoff, who I texted the
24	should be handled differently, was there also, after	24 ASC's number. I have no idea if he contacted them.
25	that, some effort by the, we'll call them the Warsaw	25 Q. How did Andrea Lefebvre get Marcus Andrade's
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1	team, including Agnieszka Bilinska, to get office space	1 personal phone number?
2	in Warsaw?	2 A. I'm not sure.
3	A. We were trying to get -- NAC was trying to	3 Q. Did you give it to her?
4	get office space in Poland back in December.	4 A. It's possible.
5	Q. And did that continue for a period, trying to	5 Q. Giving over that phone number would have --
6	get office space or trying to get somebody to get	6 well, did you give it to her with Mr. Andrade's
7	office space?	7 permission?
8	A. I believe it did try to continue for a bit.	8 A. I did not specifically ask Marcus if Andrea
9	Q. Was that still in discussion, that issue, by	9 could get ahold of him. But it was well understood
10	the time you left the company?	10 that I called Marcus on his cell phone way before, way
11	A. I don't think so.	11 before, I even became involved with NAC on his personal
12	Q. It wasn't part of the discussion after you	12 cell phone.
13	went to the Las Vegas office; correct?	13 Q. Except you had a nondisclosure agreement by
14	A. No, it wasn't.	14 the time you were the COO and giving numbers to
15	Q. So after you went to the Las Vegas office,	15 Ms. Lefebvre for Mr. Andrade; correct?
16	there was a cessation in the idea of getting office	16 A. Sensitive information is not a phone number.
17	space in Warsaw?	17 Q. That's your legal opinion?
18	A. I'm not sure I understand the question.	18 MR. KNECHT: Objection. Form.
19	Q. Okay. Is there any connection between your	19 BY MR. OLSEN:
20	visit to the office and no longer looking for Warsaw	20 Q. You don't know whether it is or it isn't;
21	space?	21 right?
22	A. None. No connection.	22 A. I don't know whether it is or it isn't.
23	Q. Like a search for Warsaw space went on at	23 Q. We talked for a minute about the
24	least for a brief time even after you were at the	24 Kathy Ireland video. I don't know. How do you
25	Las Vegas office?	25 describe that? Was it an infomercial? What was it?

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1	A. I guess it's an infomercial.	1 contract --
2	Q. Did you -- you signed the contract for that	2 Q. Just for the record, for timeline, you signed
3	project with Kathy Ireland's company; correct?	3 the Kathy Ireland contract after you had put in the
4	A. I did.	4 money or before?
5	Q. And what was your understanding at that time	5 A. Signed the Kathy Ireland contract after we
6	of the goal of that project?	6 put in the money.
7	A. Well, the goal of the video was to have	7 Q. Okay. Do you have a copy of that contract?
8	people know more about the NAC and the Aten Coin and to	8 A. Which contract is that?
9	develop more of an awareness.	9 Q. The Kathy Ireland contract.
10	Q. When, roughly, did you sign that contract?	10 A. I do not.
11	A. I signed the contract in the room with	11 MR. OLSEN: Let's take about a five-minute
12	Marcus, Brandi, and Marco Diadamo all in the room.	12 break.
13	Q. When was that?	13 (Whereupon, a recess was taken.)
14	A. On the set, while we were on Kathy Ireland's	14 BY MR. OLSEN:
15	set.	15 Q. Mr. Jodoin, we talked about John Fahy,
16	Q. And that was in December, you said?	16 F-A-H-Y, before; correct?
17	A. Yeah, I think so.	17 A. We have.
18	Q. December 2015?	18 Q. And he's an SEC attorney who was providing
19	A. I believe so.	19 services to NAC; correct?
20	Q. You had, by that time -- we know from other	20 A. Yeah, that was my understanding.
21	evidence and testimony that by that time, you had	21 Q. Okay. And you indicated you didn't have much
22	already learned that the initial projections -- we	22 contact with him, but would you be surprised if
23	talked about Mawhinney and his original projections of	23 Mr. Fahy said that he has a record of some 40 emails
24	\$140 million and \$100 million. You knew by that time	24 exchanged with you?
25	that the numbers that he had arrived at were	25 A. That would be a surprise.
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1	projections, and certainly the value was no greater	1 Q. Is it not possible or would you say he's not
2	than \$40 million and that was just based on	2 telling the truth or you just are surprised?
3	projections; correct?	3 A. Well, first of all, I didn't have the
4	A. Yes.	4 conversation with him. And I think the only details
5	Q. I think you said or maybe your wife said	5 you're getting at would have been Aga dealing with him
6	there was an effort to maybe get someone else to	6 on legal issues. But I believe that I might have been
7	replace Mawhinney with a new company?	7 CC'd on most of those or some of those. Didn't deal
8	A. Well, there was a conversation to perhaps	8 with John Fahy.
9	hire someone other than Mawhinney.	9 Q. Okay. So I'm going to rephrase my prior
10	Q. That did not occur; correct?	10 question. I don't remember how I asked it, but as far
11	A. I was not involved with hiring or getting	11 as -- I don't know if it's limited to conversations,
12	another company.	12 but as far as communications with Mr. Fahy, how many
13	Q. Okay. Okay. So you paid the \$225,000 that's	13 communications did you have with him?
14	been at issue in these cases, that you paid, you and	14 A. Well, I'm still not clear. So that I was
15	your wife paid, we'll get to that, paid by you as a	15 directly contacted?
16	couple, I guess. That payment occurred early November;	16 Q. I'll start with directly contacted or
17	correct?	17 contacted him. Let's start there.
18	A. Yes, that's correct.	18 A. Well, I don't believe I really contacted John
19	Q. Okay. What was the date again?	19 Fahy. If I did, it was with Marcus on the line. If I
20	A. November 6th.	20 directed an email, it was probably to introduce Aga and
21	Q. Excuse me one second. And you signed it,	21 whatever else, but I was just privy to what they were
22	just on the Kathy Ireland contract issue, you signed	22 communicating back and forth mostly.
23	the contract on the Kathy Ireland deal after that date;	23 Q. Okay. How many communications, let's start
24	correct?	24 with emails, email communications, would you say that
25	A. You mean I signed the Kathy Ireland	25 you were copied on in an exchange with Mr. Fahy?

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1	A. I couldn't count. I don't know. A few.	1 MR. KNECHT: Objection.
2	Q. How about telephone conversations? You	2 BY MR. OLSEN:
3	mentioned one telephone conversation in which you were	3 Q. I'm going to direct you to Exhibit 1, the end
4	a participant. And I want to be sure to define	4 of Exhibit 1, starting with page 0085.
5	telephone conversations broadly. A call placed by you,	5 A. Just give me a second.
6	a call received by you involving Mr. Fahy, whether you	6 Q. Sure.
7	were the named person or not, how many calls?	7 A. What page was that again, sir?
8	A. I don't know.	8 Q. 0085. It's toward the end of Exhibit 1.
9	Q. Less than 10?	9 A. I had that printed off.
10	A. Yes.	10 Q. You probably did. Corey Jodoin's First
11	Q. So you would be surprised if he said there	11 Supplemental Responses to Plaintiff's First Set of
12	were 30?	12 Interrogatories. You've seen this document before;
13	A. Yep.	13 correct?
14	Q. Is he being truthful or are you just	14 A. Yes, I have.
15	surprised it's that many and you've forgotten?	15 Q. Your wife and I, in her deposition, talked at
16	A. Could be both. I don't know -- I don't think	16 some length about her interrogatories. I'm not going
17	John Fahy was actually directly out to me personally.	17 to go through the whole process. The responses are
18	Q. Well, let's put this in context. You were	18 quite similar, if not in some points, identical. I
19	the COO for most of this time you would have been	19 think, if you look at the second page of these
20	dealing with Mr. Fahy; correct?	20 interrogatories, the answer to page -- sorry,
21	A. Well, wouldn't the chief legal officer be	21 Interrogatory No. 1, I think we decided in speaking to
22	dealing with legal matters?	22 your wife that the statement, "The FBI interviewed me
23	Q. I don't know, but you were an officer of the	23 and Brandi in August -- I think on August 27th," that
24	company; right?	24 year was 2018; is that correct? Or was it 2019?
25	A. Yeah. So my knowledge of what's going on	25 A. I think 2018 sounds right.
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1	should be --	1 Q. And that interview, that took place where?
2	MR. KNECHT: Objection.	2 A. In Las Vegas.
3	MR. OLSEN: Sorry. Are finished, Adam?	3 Q. Have you communicated with the FBI since that
4	MR. KNECHT: Yeah. My objection is just	4 interview by any means of communication?
5	objection to form. Calls for a legal conclusion.	5 A. I have not.
6	BY MR. OLSEN:	6 Q. Have you instructed your -- well, has your
7	Q. Practical conclusion. Just in management of	7 lawyer, to your knowledge, communicated with the FBI
8	a company, you wouldn't be surprised to be involved in	8 since the interview by any means?
9	communications with the company's SEC lawyers when the	9 A. I don't believe so, and not by my
10	company consisted of less than a dozen management;	10 instruction.
11	right?	11 Q. Did you provide your interrogatory answers,
12	A. Like I said, the people dealing with John	12 either this supplemental set or the original set, to
13	Fahy would have been the legal officer and the CEO. I	13 the FBI?
14	believe I was just privy to knowing what they were	14 A. I don't believe so.
15	talking about.	15 Q. Did anyone else do so?
16	Q. In your prior company, the trenching company,	16 A. I'm unaware if they have.
17	did you deal with lawyers?	17 Q. Did you provide any other of the discovery
18	A. As the COO, never. Never.	18 responses that you provided in this case, discovery
19	Q. Never? The company had legal troubles;	19 being requests for production, requests for admissions,
20	right? Went into receivership?	20 interrogatories, did you provide any of those other
21	A. As an owner of the company, I dealt with	21 documents to the FBI?
22	lawyers.	22 A. I don't believe so.
23	Q. Did they send two emails, lawyers to the	23 Q. And, to your knowledge, did anyone else do
24	owners, and then one to the officers separately?	24 so?
25	Probably not; right?	25 A. That is correct.

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1 Q. Did you provide a copy of your counterclaim 2 in this action or the counterclaim in this action to 3 the FBI at any time? 4 A. No, I had not. 5 Q. In your meeting with the FBI, did you tell 6 the FBI that you felt you'd been defrauded by NAC or 7 Mr. Andrade? 8 A. I don't believe so. 9 Q. Did you tell them there was -- there were any 10 misrepresentations that you relied upon in dealing with 11 NAC, either putting your money in or becoming an 12 officer? 13 A. Yes. 14 Q. Did you make a statement that the 15 misrepresentations included the valuations that 16 Mr. Mawhinney had generated? 17 A. Well, they asked most of the questions. 18 Q. I'm not really interested in what they asked 19 you now as what you said to them. What were your 20 answers? Did you have an answer like that? 21 A. I did talk to them about a phone call so -- 22 let me rephrase this. I did talk to them about the 23 valuation or the -- we felt was different than what 24 was -- I guess we gave them a general story what was 25 going on, which valuation was an issue.	Page 102	Page 104
1 Q. What did you tell them about the valuation? 2 A. I don't recall every detail, but -- 3 Q. Okay. Then let me break it down for you. 4 Did you tell them that the valuation that Mawhinney had 5 generated, valuations, were a misrepresentation made to 6 you? 7 A. No. I think those were Marcus' valuations. 8 Q. Well, okay. So the Mawhinney valuations, you 9 know what we're talking about, \$100 million, 10 \$140 million, \$40 million, those valuations -- those 11 projections -- let me finish my question -- those 12 projections, you told the FBI that you relied on those 13 numbers to make an investment and that it was a 14 misrepresentation of the value; is that correct? 15 A. I think it's irrelevant. They didn't really 16 care -- 17 Q. I don't really care -- I'm just asking you. 18 I don't know anything about what's relevant to the FBI. 19 I'm asking you your statements to the FBI. That's 20 what's important to me. 21 A. What I'm saying is I don't recall because it 22 didn't seem like it was a concern or an issue. 23 Q. If the FBI were to tell us that you made 24 statements like that, that you felt there was a 25 misrepresentation by Marcus based on those numbers that	Page 103	Page 104

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1	know who it was, but you know there was ID verification. In fact, you sent out statements, representations on your own, to people buying these coins that there was ID verification; isn't that correct?	1	A. That is not true.
2	6 MR. KNECHT: Objection. Misstates previous testimony. But go ahead.	2	Q. Okay. That is the impression you gave the FBI in your meeting with the FBI; correct?
3	7 BY MR. OLSEN:	3	A. I have no clue. They didn't tell me that was their impression so I wouldn't know.
4	8 Q. You can answer that. You remember your testimony.	4	6 Q. I've seen their impressions, and that's their impression. It's because of the things you told them, which were misrepresentations, were they not, about ID verification at NAC by you?
5	9 A. Well, you're fast-forwarding a lot of time now. So your questioning isn't relevant to the timeframe.	5	10 A. In my knowledge of what the ID verification had changed three times while I was there. The third time it looked like it was seamless and it looked like it was working well. That's all I can attest to.
6	11 Q. The timeframe at which time you spoke with the FBI.	11	14 Q. So, again, we talked about this before and I don't want to beat a dead horse, but you're distinguishing between ID verification in existence and ID verification being more seamless and better over time? You would agree it was more seamless and better over time; correct?
7	12 A. You're saying right now that I, back in February, when I wrote all these informations, we were actively pursuing ID verification.	12	15 A. It was getting better, yes.
8	13 Q. Right. And you've not -- you testified -- in fact, you've never testified that there was not ID verification in this deposition today. You've testified to the contrary. You testified that there may have been other people sought as new contractors, but not that it didn't exist. That's what you testified to today.	13	16 Q. Okay.
9	14 A. Yeah, I testified that the ID verification did exist, but I can only account to what I know. And the last time I knew that the verification was in process, it was still a work in process.	14	17 A. I have no clue after working in 2016.
10	15 Q. Well, you're contradicting your own testimony. You said it existed. You're saying it was a work in progress. I take that to mean that there was a forward-looking attempt to do something new and different; fair?	15	18 Q. Did you tell the FBI there isn't any -- NAC doesn't have any technology?
11	16 A. Wrong. You showed me three or four different forms of ID verification, which goes to attest to my actual testimony today that it was a work in process.	16	19 A. Why would I say that?
12	17 It was growing and it was evolving as we were getting further down the road.	17	
13	18 Q. So you made statements to purchasers that there was ID verification and a process for ID verification when you believed at the time it was a work in progress? That's not your testimony on that topic.	18	Page 108
14	19 A. That's not what I said, and you're putting words in my mouth.	19	Q. That's a good question. If the FBI seem to be saying that based on their interview with you, would that be a misstatement by the FBI about what you said?
15	20 Q. I'm putting words on the page that you said earlier today. Let me ask it this way.	20	4 A. I don't know. They asked us if the technology worked. We said yes. They asked us, does it actually mine. We said yes. They asked us if you've seen any patents. I had to say no, never did see a patent from Marcus.
16	21 A. So you said -- you seem to be saying by work in progress you mean there isn't any ID verification?	21	9 Q. Okay. That part is easy. Those are of record so that part is easy. So you told the FBI that?
17	22 Q. Okay. We talked about when you went through the wallet and verification process yourself back in 2014, I think you said?	22	10 A. I did.
18	23 A. Something like that.	23	11 Q. Okay.
19	24 Q. Okay. We talked about the name Junio as the third-party ID verification company. This is a few years ago, I acknowledge, but you don't have any	24	12 MR. OLSEN: Let's take a few-minute break. I may be finished. Let's just break for a couple minutes and regroup.
20	25	13 MR. KNECHT: Sounds good. (Whereupon, a recess was taken.)	
21		14 BY MR. OLSEN:	
22		15 Q. We talked about when you went through the wallet and verification process yourself back in 2014, I think you said?	
23		16 A. Something like that.	
24		17 Q. Okay. We talked about the name Junio as the third-party ID verification company. This is a few years ago, I acknowledge, but you don't have any	
25		18	

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<p>1 recollection of the Junio logo actually appearing on 2 the screen?</p> <p>3 A. It could have been there. I don't recall.</p> <p>4 Q. Okay. You knew that there was some third 5 party, whoever it was, as we discussed, doing the ID 6 verification throughout the period which you were 7 either buying coins or working there; right?</p> <p>8 A. Well, originally, I just thought it would be 9 NAC doing that. I didn't realize it would be a third 10 party. But a third party makes perfect sense. It's 11 not unbelievable, for sure.</p> <p>12 Q. Well, and you know that it was the case at 13 least for some period of time that there was a third 14 party?</p> <p>15 A. Yes, I'm well aware that there was definitely 16 a third party.</p> <p>17 Q. I have one more question. There was some 18 discussion in your wife's deposition about Marco 19 Diadamo?</p> <p>20 A. Okay.</p> <p>21 Q. And on that question I asked this question, 22 it was a little more oblique, but do you have any 23 reason or any experience with your wife being disloyal 24 to you?</p> <p>25 A. Disloyal to me?</p>	<p>1 call it an alliance, but who did she work with that she 2 liked or got along with?</p> <p>3 A. Brandi got along with everybody. Brandi is 4 very happy, very bubbly. She's easy to talk to. She's 5 a people person.</p> <p>6 Q. Did she complain to you about NAC, any NAC 7 team members, management team members?</p> <p>8 A. Not that I'm aware of. She may not agree 9 with some of the decisions that Marcus would make, but 10 that doesn't mean she would ever say anything bad about 11 Marcus.</p> <p>12 Q. Or any other team members? Did she get 13 sideways with any of the team members?</p> <p>14 A. Never.</p> <p>15 Q. Any of the Polish team?</p> <p>16 A. No. She got along with everybody.</p> <p>17 Q. Marco?</p> <p>18 A. She might say bad things about her husband.</p> <p>19 Q. Well, we won't get my wife under oath.</p> <p>20 MR. OLSEN: I don't have anything else.</p> <p>21 Counsel, anything?</p> <p>22 MR. KNECHT: I don't think so. I'm fine.</p> <p>23 MR. OLSEN: That's it. We will conclude it.</p> <p>24 Thanks.</p> <p>25 THE WITNESS: Thank you very much.</p>
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<p>1 Q. Yes.</p> <p>2 A. In what way?</p> <p>3 Q. Any way that would have come up in the NAC 4 context.</p> <p>5 MR. KNECHT: Objection to form. What do you 6 mean by disloyal?</p> <p>7 MR. OLSEN: The question is out there.</p> <p>8 THE WITNESS: Can you restate it or 9 something, give it more context?</p> <p>10 BY MR. OLSEN:</p> <p>11 Q. Did she say anything, do anything, that was 12 in connection with NAC or NAC personnel that was 13 contrary to your agreements or things you discussed, 14 relationship, in the context of this company?</p> <p>15 MR. KNECHT: Same objection.</p> <p>16 THE WITNESS: You mean was she negative 17 towards someone on the team?</p> <p>18 BY MR. OLSEN:</p> <p>19 Q. Did she contradict you or your instructions 20 with respect to dealing with NAC or the team?</p> <p>21 A. I don't believe so.</p> <p>22 Q. Did she have any personal relationships with 23 people on the NAC team that would, you know, that she 24 was in alliance of any kind, relationship with another 25 person on the NAC team that was, I don't know if I'd</p>	<p>1 (Whereupon, the deposition was concluded at 2 4:44 p.m.)</p> <p>3 * * * * *</p>

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1	CERTIFICATE OF DEPONENT	
2	PAGE LINE CHANGE REASON	
3	_____	
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12	_____	
13	* * * * *	
14	I, COREY JODOIN, deponent herein, do hereby	
15	certify and declare the within and foregoing	
16	transcription to be my deposition in said action; that	
17	I have read, corrected, and do hereby affix my	
18	signature to said deposition under penalty of perjury.	
19	COREY JODOIN, Deponent	
20		
21		
22		
23		
24		
25	Job No. 40188	
	Page 114	
1	CERTIFICATE OF REPORTER	
2	STATE OF NEVADA)	
3) ss;	
4	COUNTY OF CLARK)	
5	I, Kimberly A. Farkas, a Certified Court Reporter	
6	licensed by the State of Nevada, do hereby certify:	
7	That I reported the deposition of COREY JODOIN, April	
8	16, 2020, at 1:18 P.M.	
9	That prior to being deposed, the witness was	
10	duly sworn by me to testify to the truth. That I	
11	thereafter transcribed my said stenographic notes into	
12	written form, and that the typewritten transcript is a	
13	complete, true and accurate transcription of my said	
14	stenographic notes; that review of the transcript was	
15	requested.	
16	I further certify that I am not a relative,	
17	employee or independent contractor of counsel or of any	
18	of the parties involved in the proceeding; nor a person	
19	financially interested in the proceeding.	
20	IN WITNESS WHEREOF, I have set my hand in my	
21	office in the County of Clark, State of Nevada, this	
22	1st day of May, 2020.	
23	Kimberly A. Farkas, CCR NO. 741	
24		
25		

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